**Responses to Comments Received on the Napa County Public Draft Regional Climate Action and Adaptation Plan (RCAAP)**

This document responds to comments received during the 60-day public comment period for the Draft Napa County Regional Climate Action and Adaptation Plan (RCAAP). The tables that follow include broad responses to common themes and concerns that project staff observed during the RCAAP development and public engagement processes, along with responses to specific comments. Where a comment relates to a particular part of the plan, or a specific measure or action, those sections are referenced directly.

The comment period ran from August 1 through September 30, 2025. Every comment was read and discussed carefully by project staff and the consultant team. When several commenters raised similar points, those comments were grouped together to give one thoughtful, thorough answer rather than several partial ones. Throughout, staff's guiding question was simple: does this comment help build a plan that's clearer, more equitable, and effective at reducing emissions and preparing the Napa community for a changing climate?

That review produced real changes. Clear concerns were raised about affordability and mandates that could raise the cost of living or doing business in Napa. In response, several measures were revised to prioritize education and incentives over rigid mandates, giving the plan a more flexible, long-range path to its emissions targets. Specific actions were also sharpened to clarify who is responsible for implementation and how it will happen.

The result is an RCAAP shaped by residents, agency partners, and staff, built around common goals: net-zero greenhouse gas emissions in Napa County and a more climate resilient community by 2045.

The Napa County Regional Climate Action and Adaptation Plan is a countywide effort, uniting Napa County with the cities of American Canyon, Calistoga, Napa, and St. Helena, and the Town of Yountville. The plan targets emissions from vehicle travel, electricity use, natural gas consumption, and other local sources, and builds the region's resilience to climate impacts. Read the plan at https://climateactionnapa.konveio.com/.

The response-to-comments document consists of the following sections:

1. Introduction
2. Responses to common themes and specific concerns
3. Comments made directly on the Draft RCAAP document in the Konveio online platform
4. Comments received via email
5. Comments received in letter format

## 2. Responses to Comments Received on the Napa County Public Draft Regional Climate Action and Adaptation Plan (RCAAP)

This table includes broad Responses to common topics or themes that were commonly raised across comments received on the Draft RCAAP. Additionally, individual responses to some comments are included as requested by staff. This table does not include a complete/exhaustive set of responses to all individual comments received. A complete list of individual comments and staff responses to those comments are provided in sections and tables following this table.

| Comment Topic | Commenter(s) | Summary of Comments | Response |
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| Responses | | | |
| **Response #1:** GHG Measure BE-1 | Winegrowers of Napa County, North Bay Association of Realtors, Stefani Phipps, Hillary Ryan, Andy Ryan, Christopher Warner | Commenters express concern regarding BE-1's proposed actions, citing the high costs and infeasibility of requiring all homes to convert to electric systems, which could financially burden certain groups. Concerns include the skilled workforce, funding to support such retrofits, and doubts about the current electricity grid's ability to handle increased demand. Several comments highlight that residential buildings contribute less to overall emissions than other sectors, questioning why homeowners face such strict requirements. Many recommend shifting from mandates to incentive-based programs, starting with government facilities and new construction, and providing homeowners with flexible, practical options for energy efficiency improvements. | Concerns have been raised that GHG Measure BE-1 may disproportionately affect residential buildings. As discussed in Appendix B, building energy accounts for 23 percent of the region's emissions, the second largest sector. Of that, residential emissions account for 38 percent of building energy emissions (Table 11 of Appendix B). BE-1 addresses emissions from both residential and non-residential buildings, and the measure description has been revised to also emphasize its scope for non-residential buildings. This measure plays a crucial role in reducing GHG emissions by starting with the most readily accessible opportunities, such as equipment replacements. Local jurisdictions have more influence and jurisdiction over the building energy sector than most other sectors. Implementing reach codes for the electrification of existing buildings and financial incentives for electrification upgrades have direct GHG reduction benefits. In contrast, the local jurisdictions have more limited influence in reducing transportation emissions, the largest emissions sector, relying on relatively more expensive infrastructure updates and voluntary transportation demand management programs that have more indirect impacts.<br><br>Regarding funding, BE-1 includes actions to secure funding and incentivize electrification and energy efficiency upgrades, such as affordable financing, rebates, and support for electric panel upgrades (see Actions BE-1-A and BE-1-B). The plan also calls for waiving or reducing permitting fees for all-electric conversions (BE-1-J), making retrofits more accessible and reducing financial burdens, especially for those with limited means. See Response #5 for additional discussion on potential funding sources.<br><br>With respect to both grid and workforce readiness, BE-1 addresses both. Action BE-1-B calls for collaboration with PG&E to ensure necessary upgrades to local electrical infrastructure are planned and implemented in parallel with electrification efforts, including investments in grid modernization, resilience, and integration of renewable energy and battery storage. BE-1-B has also been revised such that electrification efforts would not go forward until the applicable grid capacity has been confirmed by PG&E. BE-1 also manages infrastructure and workforce gaps through partnerships with local workforce organizations, educational institutions, and industry groups to expand training and certification programs for contractors and technicians (BE-1-N), and by streamlining permitting processes and technical assistance resources (BE-1-T).<br><br>BE-1 includes flexibility during reach code development to consider compliance triggers based on metrics like floor area or project valuation (BE-1-D), and stakeholder outreach (BE-1-E) to refine requirements for different building types and ages. The plan emphasizes voluntary programs and incentives, such as rebates and affordable financing, enabling homeowners to make improvements at their own pace (BE-1-B, BE-1-K). Mandates are phased in gradually, with residential reach codes not enforced until 2031 in accordance with recent legislation (i.e., AB 130), allowing for a smooth transition and prioritizing incentives and education in the near term. Community outreach and education programs (BE-1-K) provide practical guidance and a menu of energy efficiency options, ensuring property owners can select improvements that fit their needs and budgets. The RCAAP is committed to equitable climate action, with BE-1's phased implementation, incentives, and outreach designed to avoid affordability challenges, and the framework allows for ongoing refinement based on community feedback to ensure measures remain fair and feasible. See also Response #7 (Equity and Affordability). |
| **Response #2:** GHG Measure BE-2 | North Bay Association of Realtors, Stefani Phipps, Hillary Ryan, Andy Ryan, Christopher Warner | Commenters generally support the value of energy audits for non-residential buildings, recognizing their potential to identify cost-effective energy efficiency improvements and reduce emissions. However, concerns were raised about the potential economic impact on businesses and residents, with some fearing increased costs and regulatory burdens, especially on current real estate listings and transactions. Several commenters questioned the effectiveness of mandatory audits and called for a thorough cost-benefit analysis before implementation. There were also calls for government leadership by prioritizing audits in public buildings before extending requirements to the private sector. | BE-2 has been wholly rewritten per the comment recommendations. In response to concerns about potential economic impacts on businesses, the measure no longer requires non-residential energy audits; instead, it offers free or subsidized energy audits for both non-residential and residential buildings and relies on existing benchmarking standards (e.g., PG&E Building Benchmarking). Additionally, municipalities would be required to perform these energy audits on 90 percent of their owned and operated buildings within 1 year of the RCAAP adoption and every 5 five years after. Action BE-2-F ensures that there will be reliable, long-term funding sources for this program. Regarding additional cost-benefit analyses concerns, see Response #5. |
| **Response #3**: 2030 and 2045 GHG reduction targets. | Celeste Mirassou, Napa Schools for Climate Action | Commenters expressed concern and requested clarification as to why the RCAAP changed the regional goal for carbon neutrality from 2030 to 2045. | In 2021 and 2022, local agencies in the county adopted resolutions establishing ambitious goals of reaching carbon neutrality by 2030. However, no analysis was done prior to adoption of these goals that demonstrated how these ambitious goals would be achieved. Additionally, these goals were set prior to the passage of Assembly Bill (AB) 1279 and adoption of CARB's 2022 Scoping Plan in late 2022. The RCAAP provides a detailed, quantified set of strategies, measures, and implementation actions to achieve GHG reductions and carbon neutrality by 2045, consistent with AB 1279 and the State's 2022 Scoping Plan. Chapter 2 text will be revised to provide a more detailed explanation. See additional discussion related to targets in Section 3.2 of Appendix F. |

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| **Response #4** Implementation Details and Prioritization | Christopher Warner, North Bay Association of Realtors, Napa Valley Vintners, Winegrowers of Napa County, Chris Benz | Commenters express the need for more implementation details and how measures will be carried out and prioritized. | The RCAAP is a long-range, regional planning framework that sets countywide direction for implementing a broad suite of GHG mitigation and adaptation measures. It is not intended to prescribe every conceivable step that would take place during implementation after the RCAAP is adopted. It provides implementation details and assumptions for individual measures across Chapters 3, 5, 6, and Appendices H and I (e.g., applicable jurisdictions, potential partners, short- and long-term actions, implementation mechanisms, rough "order-of-magnitude" implementation cost estimates for some measures). The RCAAP provides a broad implementation framework in Chapter 6 that will inform subsequent interagency coordination efforts and programming decisions following RCAAP adoption over a 20-year period.<br><br>A critical first step for all six Napa County Jurisdictions after RCAAP adoption will be to further define, prioritize, and decide which programs or projects need to be developed immediately, based on the near-term implementation actions under each measure (e.g., hiring new staff, securing specific funding and financing sources to support near-term actions).<br><br>The RCAAP includes some information that could serve as a basis for prioritization (e.g., measures with the largest quantified GHG reduction estimates). Some additional details have been added to Chapter 6 to further clarify implementation assumptions and priority near-term RCAAP-wide and programmatic implementation steps. The six Napa County Jurisdictions will decide who is leading versus supporting implementation, along with the jurisdictional staff prioritizing dozens of measures and hundreds of discrete implementing actions to begin making progress on implementation. Napa County Jurisdictions will collaborate to ensure that implementation steps taken by individual jurisdictions are coordinated and aligned with the RCAAP's overall strategies, targets, goals, and performance measures, such that implementation outcomes defined in the RCAAP are actually achieved (e.g., progress towards meeting GHG targets in 2030 and 2045), while also accounting for the unique needs and characteristics of each community during implementation. |
| **Response #5:** Cost Estimates, Cost-Benefit Analysis, and Potential Funding and Financing Sources | Richard Seiferheld, Christopher Warner, North Bay Association of Realtors, Napa Valley Vintners, Winegrowers of Napa County, Chris Benz | Commenters state that detailed and full implementation cost estimates and cost-benefit analyses for each measure, along with estimated costs to residents, businesses, and other parties, should all be completed prior to RCAAP adoption. | The RCAAP provides estimated costs and potential funding and financing sources at an appropriate level for a long-range regional framework plan. The RCAAP includes preliminary cost estimates for a subset of prioritized measures, which serve as preliminary, illustrative order-of-magnitude estimates that carry an acknowledged accuracy range of -30 to +50 percent of actual costs. These preliminary cost estimates provided reflect standard practice at this stage of planning when many implementation details are not yet and cannot be fully defined until actual implementation begins following plan adoption (e.g., adequate staffing is in place, funding and financing are fully secured, procurement details are scope and defined, technology availability has been fully assessed relative to the program's needs, and other detailed program design parameters).<br><br>Detailed benefit-cost analyses and costs to residents and businesses were outside the scope of this planning effort because such analyses would require program design details and up-to-date, program-specific parameters, all of which will be developed locally after RCAAP adoption by one or more of the Napa County Jurisdictions during measure-specific implementation efforts.<br><br>A preliminary funding and financing assessment was also prepared as part of the RCAAP that outlines potential funding sources, potential financing mechanisms, and a recommended long-term investment strategy (see Appendix I). It is assumed that jurisdictions will sequence implementation to align with funding availability, prioritizing outside grants first. Where appropriate, pilots and phased implementation can be used to validate costs and delivery models before scaling, and regular implementation monitoring will uncover necessary adjustments that need to be made. See also Topical Response #4 above, which addresses the need for near-term prioritization of implementation steps to fully coordinate and finalize implementation sequencing. |
| **Response #6:** Mandatory vs. voluntary, measures | Hillary Ryan, Andy Ryan, Stefani Phipps, Jonna Beck Lewis, North Bay Association of Realtors, Winegrowers of Napa County, Sustainable Winegrowing Alliance, Christopher Warner | Commenters raise concerns about the mandatory nature of several measures and request more emphasis on voluntary measures, flexibility, and incentive-based approaches. | The Final RCAAP emphasizes incentives, education, and phased implementation – not immediate, across-the-board mandates. Implementation will occur gradually through development and adoption of local programs, updates to codes and ordinances, and interjurisdictional collaboration. Because implementation approach and impacts may vary slightly by jurisdiction, consistent support across all six agencies will be essential. Furthermore, RCAAP implementation approaches must continue to honor the commitment to act with a sense of urgency, and local agencies will work to minimize costs and support residents and businesses with resources, financing, and streamlined permitting. Local agencies will lead by example through electrification, renewable energy, and climate-resilient facilities. See Final RCAAP, Chapter 6, for additional details on implementation procedures that will be employed by the Napa County Jurisdictions. See also previous Responses #1 and #2 for additional considerations regarding comments and concerns regarding mandatory building energy measures.<br><br>The RCAAP has been prepared in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15183.5, which allows for public agencies to develop and use a qualified "plan for the reduction of greenhouse gases" to streamline the analysis and mitigation of GHG emissions for future discretionary projects, provided that such a plan is consistent with the required "plan elements" specified in Section 15183.5(b). All elements of the RCAAP, including the proposed GHG reduction measures, are consistent with the guidelines, as described and summarized in detail in the Final RCAAP under Chapter 6 (see Table 6.2, "RCAAP Compliance with Elements of a Qualified Greenhouse Gas Reduction Plan Under the CEQA Guidelines, Section 15183.5(b)."") The RCAAP's analysis of GHG reduction strategies, measures, and implementing actions demonstrates that their collective implementation would achieve the 2030 and 2045 targets. The RCAAP also identifies how, if certain GHG measures were implemented and applied on a project-by-project basis, the measures collectively would achieve the 2030 and 2045 targets. Proposed GHG measures that address the largest GHG emissions sources, such as building energy, transportation, and solid waste, include some mandatory provisions in order to meet the substantial evidence requirements of CEQA. If all GHG reduction measures in the RCAAP were voluntary and no enforceable provisions were included or phased in over time, the effectiveness of many quantitative GHG measures in the RCAAP would not be based on substantial evidence, resulting in the RCAAP not meeting the requirements of CEQA Guidelines 15183.5(b). |

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| **Response #7**: Equity and Affordability | Richard Seiferheld, Christopher Warner, North Bay Association of Realtors | Commenters request equity and affordability evaluation prior to adoption, with concerns about impacts on vulnerable communities. | The RCAAP was developed with equity and affordability in mind. Section 1.2 sets forth clear equity principles and identifies tools that may be used during plan implementation to target investments and ensure that communities with the greatest need experience the plan's benefits. Additionally, the suite of measures and actions contained within the plan broadly includes affordability tools (e.g., rebates, streamlined permitting, and fee waivers) and ongoing engagement to help promote these outcomes. Actual outcomes in equity and affordability will depend on how each jurisdiction implements measures and actions, especially those that allow greater flexibility in approach. |
| **Responses to Individual Comments** | | | |
| **Response #8:** Inventory/Forecast - Demographics | Richard Seiferheld | Commenter expresses concern about the demographic growth forecasts and whether they include certain projects. | The population, housing, and employment forecasts are developed using area-wide, annualized demographic data that align with local and regional planning efforts. Rather than accounting for individual development projects, the forecasting approach relies on data provided by each jurisdiction or, when unavailable, on the Metropolitan Transportation Commission's Plan Bay Area 2050 planning document. This ensures consistency with established planning practices and provides a comprehensive, long-term view of growth trends across Napa County. See Section 1.2 of Appendix E for further information on the forecast assumptions.<br>As a result, projects not included in these jurisdictional or regional data sources are not reflected in the current forecast or inventory. Only with a scheduled inventory update—described in Chapter 6, Section 6.4 (Future Plan Updates) of the RCAAP—would new projects implemented after the initial inventory be incorporated into future versions of the plan. |
| **Response #9:** Inventory/Forecast - Demographics | Pam Reeves | Commenter notes that the RCAAP overestimates the number of municipal employees for Yountville. | The employee counts for all cities were obtained from the State Controller's Office, which tracks income taxes and includes part-time employees, such as recreation assistants, as well as paid council members. See source [1] under the calculation of Measure OF-1 in Attachment A of Appendix F. |
| **Response #10:** Inventory/Forecast - Air Travel Emissions | Pam Reeves, Jeff Farmer | Commenters request clarification concerning air travel-related emissions and why these were not mentioned. | Aircraft-related GHG emissions are excluded from this analysis, consistent with the ICLEI U.S. Community Protocol, and because the jurisdictions do not have operational control of the airport. This is addressed in Table 1 of the inventory update memorandum in Appendix B. However, ground-support equipment at airports, as well as airport facilities, are included in the off-road and building energy sectors. Additionally, aircraft emissions are accounted for in the county's Short-Lived Climate Pollutant Inventory (Appendix D). |
| **Response #11:** Inventory/Forecast – Building Energy | David Graves | Commenter expresses concern that the zero value of PG&E's 2019 emission factors is misleading and cites PG&E's 31% renewable portfolio for 2019, which is not GHG-free. | The 2019 PG&E emission factors were based on the best available data through the CEC's Power Content Label, which showed that PG&E did not source any electricity from GHG-emitting sources in that year. Although the 2019 electricity emissions factor for PG&E may be zero in emissions, it is not representative of a 100% renewable portfolio. According to the CEC, renewable electricity is defined as energy sources that are practically inexhaustible, such as solar, wind, geothermal, hydroelectric, and biomass (See Page 1 in Chapter 1 of the RCAAP). RPS excludes nuclear or large hydroelectric sources when counting toward RPS credits. These sources, while emitting no GHGs, are not technically renewable. |
| **Response #12:** Inventory/Forecast - Agriculture | Miguel García | Commenter requests clarification of what is included in the agricultural sector. | The agricultural sector includes emissions from enteric fermentation in livestock, manure management, fertilizer use, and equipment. It does not account for carbon sequestration or soil respiration. See Table 18 of Appendix B of the RCAAP for more information. |
| **Response #13:** Inventory/Forecast - Carbon Sequestration | Chris Benz | Commenter requests clarification on the methodology behind the level of carbon sequestration used for 2019, related to Figure ES.2 | Figure ES.2 shows the GHG emissions with and without measures applied. The carbon sequestration reductions quantified in the measures (namely Measures AG-6 and AG-7) are based on the net change from 2019 conditions. That is, the quantified reductions are above and beyond any sequestration efforts occurring in 2019. Thus, no sequestration is quantified for 2019 levels for comparison purposes. See Measures AG-6 and AG-7 for the estimated net GHG reductions due to enhanced carbon sequestration. See the calculations for Measures AG-6 and AG-7 in Attachment A of Appendix F of the RCAAP. |
| **Response #14:** Inventory/Forecast - Carbon Sequestration | Napa County Resource Conservation District | Commenter expresses concern about the accuracy of carbon sequestration estimates in the Regional Carbon Stock Inventory and requests that the RCAAP include a strategy to verify local soil carbon sequestration potential. | While the Regional Carbon Stock Inventory is already published and cannot be revised, long-term Action AG-3-G has been added, such that the evaluation of the effectiveness of short-term actions would include verifying local soil carbon sequestration potentials for implemented carbon farming practices. |
| **Response #15:** Inventory/Forecast - Off-Road Equipment | Anonymous | Commenter requests clarification on where equipment used for vegetative fuel treatment is categorized. | Equipment for vegetative fuel treatment (e.g., chainsaws, chippers, bulldozers/excavators) falls under the Off-Road sector within multiple non-agricultural categories (e.g., construction, lawn and garden). Emissions and categorizations were obtained from CARB's OFFROAD model (version 1.0.1). All agricultural equipment classes identified in OFFROAD were attributed to the agricultural sector in the RCAAP. Refer to CARB's web-based OFFROAD model for specific equipment categorizations and classifications, as noted in Appendix B of the RCAAP. Refer to CARB's off-road technical documentation for equipment-specific assumptions (https://ww2.arb.ca.gov/our-work/programs/msei/road-categories/road-diesel-models-and-documentation). |
| **Response #16:** Inventory/Forecast - Off-Road Equipment | Anonymous | Commenter refers to off-road equipment emissions in Table 2.4 and requests clarification on the assumed lifespan of current equipment in use. | Table 2.4 refers to the GHG emissions forecast under the legislative-adjusted scenario. With respect to the forecast, no assumptions apart from model defaults have been made regarding equipment lifespans. CARB's OFFROAD model, used to estimate future off-road emissions, aggregates multiple off-road models with individual assumptions about equipment lifespans. For example, the 2021 Agricultural Equipment Emissions Inventory accounts for population and activity forecasts based on age distributions and applies a declining growth curve for aging equipment. Refer to Appendix B of the RCAAP for further discussion of the off-road sector. Refer to CARB's off-road technical documentation for equipment-specific assumptions (https://ww2.arb.ca.gov/our-work/programs/msei/road-categories/road-diesel-models-and-documentation). |

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| **Response #17:** Inventory/Forecast – Solid Waste | David Graves | Commenter expresses concern that the solid waste (waste-in-place) emissions from landfills in the county are overestimated due to existing landfill gas capture technology and cites EPA's FLIGHT database. | The 2019 methane emissions attributed to the American Canyon Sanitary Landfill and Clover Flat Landfill were directly obtained from EPA's FLIGHT database (Subpart HH). These emissions already account for landfill gas capture and flaring. Detailed methodology is included on Page 19 of Appendix B of the RCAAP. |
| **Response #18:** Inventory/Forecast – Wastewater | David Graves, Andrew Damron | Commenters express concern that the emissions from the wastewater sector were overestimated and cited NapaSan's 2023 Climate Mitigation Analysis. | The 2019 inventory assessed emissions across the entire Napa region. To optimize our modeling process within budgetary constraints, individual municipal wastewater processes were not analyzed, as this sector accounts for a small fraction of regional emissions (<5%). Therefore, we used a conservative population-based approach per ICLEI's US Community Protocol to characterize wastewater treatment across the entire county, excluding septic tanks. In all, wastewater accounts for about four percent of total emissions in the region. If we corrected this, the entire county's emissions could be reduced by about two percentage points. See Page 18 of Appendix B for the discussion on the wastewater emissions methodology. |
| **Response #19:** Measures – Building Energy | David Graves | Commenter recommends that new buildings be given preference if they use low-carbon materials. | Low-carbon materials are included as part of Measure BE-5. |
| **Response #20:** Measures - Transportation | Robert [Last name not provided] | Commenter requests clarification on whether the production and transport of renewable diesel would involve the use of fossil fuels. Commenter expresses concern that renewable diesel is not renewable. | The production and transport of renewable diesel would emit emissions; however, the production and transport of conventional diesel also emits emissions. While transport-related emissions may be similar, producing renewable diesel would result in lower GHG emissions than producing conventional diesel, especially given the renewable nature of the feedstock used to produce it. According to CARB's Low Carbon Fuel Standard fuel pathways analyses of all participating fuel producers, the carbon intensity (GHG emissions per unit of energy) of renewable diesel is negative compared to diesel. This carbon intensity includes life-cycle production-related emissions for fuels. |
| **Response #21:** Measures - Transportation | Jeff Farmer | Commenter requests that roundabouts be considered as transportation improvements in measure TR-12 to reduce vehicle idling. | TR-12 focuses on funding overall transportation improvements as EVs reduce the amount of gas tax municipalities collect. The examples listed in TR-12 relate to possible alternative funding sources for the gasoline sales tax. Roundabouts are not out of the realm of possibility for the actual improvements that would be funded, but that is not the focus of the measure. Nevertheless, TR-12 will be removed from the RCAAP as directed by staff for reasons unrelated to this comment. |
| **Response #22:** Measures - Transportation | Napa Valley Transportation Authority | Commenter expresses concern that the target for Measure TR-11 is confusing because businesses with 50 or more employees are already required to participate in the Bay Area Commuter Benefits Program. | The GHG reduction quantification of Measure TR-11 was based on a 50% eligibility rate of employees and 100% participation rate of employers, using CAPCOA's *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* Measure T-5 (Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring)) as a guide. CAPCOA assumed that for projects implementing this measure, 26% commute VMT could be reduced if all employees were eligible for a given employer's program. We used a conservative assumption that 50% of employees would be eligible. However, whether 100% of employees for 50% of employers or 50% of employees for 100% of employers is assumed, the measure targets a 13% reduction in commute VMT relative to the forecasted commute VMT values. See the calculation of TR-11 in Appendix F of the RCAAP. Measure TR-11 has been revised to clarify that the target is to reduce commuter VMT by 13% by 2030. The description of Measure TR-11 has also changed to clarify the intent of the measure. |
| **Response #23:** Measures - Transportation | David Graves | Commenter recommends that additional actions be taken to require that wine businesses reduce transportation emissions from shipping wine. | Measure BE-4 addresses sustainability certification for wineries. Currently, certification entities such as Napa Green do account for sustainable supply chain considerations, including distribution. Although transportation-related reductions were not accounted for in this measure, emissions reductions from sustainable distribution could occur under this measure. |
| **Response #24:** Measures - Agriculture | Napa Green | Commenter suggests that Measure AG-8 include sheep grazing as an action to enhance carbon farming. | Measure AG-8 is focused on reducing GHG emissions from livestock. The recommendation, while valid, is better suited to Measures AG-3 and AG-4, which target emissions from equipment and carbon farming. Measures AG-3 and AG-4 have been amended to include this recommended action. A cross-reference text has been added to Measure AG-8 to direct readers. |
| **Response #25** Measures – Solid Waste | David Graves | Commenter expresses concern that too much emphasis is placed on reducing emissions from American Canyon Sanitary Landfill, which has been closed for several years, and not enough emphasis is placed on reducing emissions from Clover Flat Landfill, which is set to close in 2027. | Measure SW-4 aims to reduce emissions from landfills within Napa County, namely American Canyon Sanitary Landfill and Clover Flat Landfill. The closure of Clover Flat Landfill in 2027 is accounted for in the quantification of the GHG reductions under Measure SW-4, such that 73 percent of the reductions estimated in 2045 would come from Clover Flat Landfill, and the rest would come from American Canyon Sanitary Landfill. See Appendix F of the RCAAP and the SW-4 calculation in Attachment A of Appendix F of the RCAAP. |
| **Response #26:** Measures - Wastewater | David Graves, Andrew Damron | Commenters express concern that TR-2 overstates the number of trips to haul winery waste to EBMUD by as much as 50% according to survey data. The commenters reference an EBMUD email correspondence stating that 12.4 million gallons were trucked from Napa County to EBMUD in 2023. | The TR-2 calculations assumed that 20 million gallons were trucked to EBMUD in 2019, not 2023, based on EBMUD data available for the 2019 baseline year. This measure assumed that 5% of this would be diverted by 2030 and 20% by 2050 below 2019 levels. The 2023 updated value of 12.4 million gallons is actually 37 percent lower than 2019, so that would mean that the county is already exceeding its goal for this measure. These calculations can be found in Attachment A of Appendix F of the RCAAP. |
| **Response #27:** Use of N/A in Chapter 3 | Multiple (Chris Malan, Napa Valley Transportation Authority, Jeff Farmer) | Commenters request clarification on the use of "N/A" throughout Chapter 3 | In Table 3.1, "N/A" is used to denote that the emission reductions for the respective measure was not able to be quantified. This is explained in the first paragraph of Section 3.2. Text in Section 3.2 and Table 3.1 have been revised to replace "N/A" with "NQ" or Not Quantified to reduce confusion. |
| **Response #28:** Carbon Stock | David Graves | Commenter recommends that CARB's Natural and Working Lands be relied upon for more accurate acreage values for landscape vegetation types for the Carbon Stock Analysis | The Regional Carbon Stock Inventory, included in Appendix C of the RCAAP, uses vegetation carbon stock values from the CALAND model, which is relied upon in CARB's Natural and Working Lands studies. Please see Appendix C for a full description of the methods used to prepare the carbon stock inventory. |

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| **Response #29:** Carbon Stock | Napa RCD | The commenter notes that although the plan emphasizes soil carbon sequestration, it provides a limited explanation of how sequestration estimates were developed. The commenter states that the referenced Regional Carbon Stock Inventory relies on generalized values from the California Natural and Working Lands Carbon and Greenhouse Gas Model, which uses broad assumptions about existing soil carbon levels and sequestration rates from sustainable agricultural practices. | As noted on Page 2-4 of Appendix C, the soil carbon stock estimates in the plan were developed using U.S. Geological Survey (USGS) soil carbon stock data. Soil carbon sequestration rates were calculated by applying the published rates for soil sequestration rates from Appendix B of the California Natural and Working Lands Carbon and Greenhouse Gas Model (CALAND) report. See Page 13 and 14 of Attachment A of Appendix C of the RCAAP and CALAND report here: https://resources.ca.gov/CNRALegacyFiles/wp-content/uploads/2019/06/caland_technical_documentation_v3_june2019.pdf. |
| **Response #30:** Controlled burns and wildfire | Winegrowers of Napa County | The commenter notes that the plan does not account for carbon emissions released during controlled burns or wildfires in natural forests, which can negate decades of sequestration gains. In contrast, vineyards experience minimal carbon release and maintain more stable canopy conditions. Ignoring burn-related emissions may overstate the carbon benefits of forest protection while undervaluing vineyards' relative stability and resilience as a land use. | Emissions associated with fire events are addressed in the Short-Lived Climate Pollutant Inventory Memorandum (Appendix D), which includes a discussion of black carbon emissions from wildfire. Please refer to Section 7 of Appendix D for additional details on how these emissions were considered and quantified. |
| **Response #31:** Wastewater Measures | Winegrowers of Napa County | The commenter asks how WW-1 (Methane Reduction from Wastewater Treatment) aligns with the new California Waste Discharge Requirements. | Measure WW-1 does not draw from or modify the State's Waste Discharge Requirements (WDRs), which govern effluent quality and discharge permitting rather than methane emissions management. |
| **Response #32:** Inventory/Forecast – Building Energy | North Bay Association of Realtors | The commenter asks what portion of building energy emissions comes specifically from the residential sector. They note that the plan does not distinguish residential emissions from commercial, industrial, governmental/public, or agricultural building energy emissions. | For a more detailed breakdown of the GHG emissions inventory, please refer to Tables 11 and 12 of Appendix B. Residential emissions accounted for 49% of the countywide building energy emissions in 2019. |
| **Response #33:** Measures - Transportation | Napa County Bicycle Coalition | Both comments L7.11 and L7.13 are asking for bicycles, e-bikes, and micromobility to be addressed explicitly by GHG reduction measures and/or actions. | This serves as a combined answer to respond to both comments L7.11 and L7.13. TR-10-D was expanded to include coordination with the Napa County Bicycle Coalition and clearer support for bicycle, e-bike, and micromobility infrastructure. However, it remains an action because it supports the broader objectives of Measure TR-10 rather than constituting a separate GHG reduction measure. The updated TR-10-D now fully addresses micromobility needs within the existing measure structure, so a standalone measure is not required. |
| **Response #34:** Environmental Review | Chris Warner | Commenter expressed concern that the Draft RCAAP has not completed environmental review. | The Public Draft RCAAP was released for a 60-day comment period from August 1 to September 30, 2026. CEQA does not require that environmental review be completed prior to the release of a draft plan for public review. Environmental review began in August 2025, following the Board of Supervisors' approval of a consultant contract amendment. A draft environmental document is scheduled for release in Spring 2026. The public will have the opportunity to review and comment on the draft environmental document. Following the closing of the public comment period, the Napa County Jurisdictions will review and consider public comments received, and the environmental document will be finalized and shared with the public and decision-makers, along with the Final RCAAP, prior to any formal adoption hearings. |

| 3. Comments made directly on the Draft RCAAP document in the Konveio online platform | | | |
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| **Comment Number** | **Name** | **Comment** | **Response** |
| 1 | Matt Zax | Recently, I sent Trump Administration an e-mail about Global Warming/Climate Change coming train wreck/disaster/abyss if we do not alter course off of coal burning, etc, and move to clean, green, renewable energy sources that do not add to or pump more massive amounts of carbon dioxide(a greenhouse gas) into this planet's atmosphere, than what we humans have already done. I laid out all the information for them with links to information, organizations, and people. It is not easy to think at this level of thought. I am trying to save our world/planet here. There is also www.climate/NASA.gov/kids website on the internet about sea level rise in a cartoon or kid friendly format. I saw that on the NASA channel (Ch. 32) on AT&T U-verse cable TV. Even in cartoon format, I found the information relevant and easy to understand. -Matt Zax, Napa, CA | Thank you for your comment. |
| 2 | Hillary Ryan | I am a Napa County property owner writing to respectfully oppose the draft Regional Climate Action and Adaptation Plan (RCAAP) in its current form. While I strongly support Napa's commitment to sustainability and responsible climate action, this proposal introduces costly and unrealistic mandates that could have serious consequences for housing affordability, economic stability, and the well-being of our community.<br><br>Key Concerns:<br>Mandatory Home Retrofits (BE-1):<br>The plan may require the electrification of all existing homes replacing gas appliances, rewiring panels, and in some cases modifying driveways or roads to support infrastructure upgrades. These proposed changes come at significant cost, often ranging from tens to hundreds of thousands of dollars per property. In a region already struggling with high housing costs, this places an unsustainable burden on working families, seniors, and homeowners with fixed incomes.<br>Point-of-Sale Mandates (BE-2):<br>Requiring costly inspections, disclosures, and retrofits during real estate transactions could derail sales and possibly reduce property values, further restricting the housing market and discouraging investment in Napa Valley.<br>California's Grid Readiness:<br>The reality is that California's electrical infrastructure is not yet equipped to support widespread residential electrification. Has Napa leadership adequately studied this and will they present findings to the public? Blackouts, grid failures during heatwaves, and ongoing reliability concerns raise serious questions about the feasibility and safety of mandating full electrification at this time. Without major State and PG&E investment in transmission capacity, grid resilience, and energy storage, such mandates could set homeowners up for energy insecurity especially during peak demand seasons.<br>Infrastructure and Workforce Gaps:<br>Napa County currently lacks the electrical capacity, skilled contractor workforce, streamlined permitting systems, and accessible funding necessary to implement these abrupt changes. Is the County prepared to execute this plan? Please provide more information about your plan to address these concerns.<br>Disproportionate Burden on Homeowners:<br>Residential buildings contribute a smaller share of emissions compared to other sectors such as transportation, solid waste, wastewater, and public infrastructure. Why do the harshest mandates fall on individual homeowners? How do you think owners of physically obsolescent homes will pay for this mandate? Do you know how many are financially incapable of meeting these demands?<br>One-Size-Fits-All Approach:<br>Applying blanket electrification requirements to older homes likely built decades before modern energy code ignores the real challenges and costs that vary widely from one property to another.<br>Opportunities for a More Balanced Approach:<br>Incentivize, Don't Mandate:<br>Provide voluntary programs; i.e. rebates for homeowners to make energy improvements at their own pace, without the proposed penalty or forced retrofits. | Thank you for your comment. Please see Response #1 (building electrification), #2 (energy audits), & #6 (implementation flexibility). |

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| | | Lead by Example:<br>Test your proposed program to begin with government-owned buildings, facilities, and vehicle fleets, which account for a significant share of emissions and can be upgraded efficiently and visibly.<br>Begin with New Construction:<br>California already has some of the most rigorous energy efficiency standards for new buildings. This is an example of an opportunity to create long-term emissions reduction without penalizing existing homeowners.<br>Provide Practical Guidance:<br>Develop a clear and accessible menu of energy efficiency options, so homeowners can select improvements that align with their homes, budgets, and timelines.<br>How will you seek expert advice/ consultation to create a set of viable solutions for homeowners?<br>Napa residents care deeply about the environment and want to be part of the solution. Meaningful climate action must be realistic, reasonably equitable, and informed by the current limitations of our infrastructure. The RCAAP, in its current form, risks creating deep inequities and further worsening our region's affordability crisis.<br><br>I respectfully urge Napa County leadership to revise this plan with a more measured, achievable path forward for your constituents. Please consider a plan that strengthens climate resilience without sacrificing affordability, fairness, or feasibility.<br><br>Thank you for your leadership and for considering these concerns. | |
| 3 | Anonymous | Suggest adding a section noting other public agencies that have played a role in this plan (NapaSan, Firewise, busses, etc). | Thank you for your comment. |
| 4 | Celeste Mirassou | Please elaborate on the "extensive" outreach: | Please see Chapter 1, Page 8 and Appendix A: Community Engagement Summary |
| 5 | Miguel García | Does the estimate for the agricultural sector only represent emissions associated with farm equipment or does it also include carbon cycling in the soil? | Thank you for your comment. Please see Response #12 (agriculture). |
| 6 | Jeff Farmer | Idling vehicles are a big source of pollution especially nitrous oxide. According to the EPA idling vehicles emit 20 times more pollution than vehicles going 30mph. Yet there is no discussion in the report on this.<br><br>Anyone who has driven down Hwy 29 in the early morning or late afternoon has seen hundreds of cars idling at the signal light at Madison in Yountville. Another big idling area is the Hwy 12/ Hwy 29 intersection at the airport. There are probably more.<br><br>But Item TR-12, pg 61 of the report has transportation improvements as not available. Spending money to improve our transportation system to reduce idling is a potential area of improvement and has the benefit of not forcing drivers to do anything differently. Roundabouts are one obvious solution. Another innovation is the "turn on yellow if safe" lights along Jefferson Street in Napa between Third Street and Clay. This can mean less idling for cars waiting to make left turns. Every little bit helps. We do have roundabouts at First Street/Hwy29 and Hw12/Hwy221 and they have been very effective to keep traffic moving. I wonder if pre and post pollution measurements were done to see how much they decreased pollution.<br><br>At the last St. Helena ATSC meeting on September 3rd we had a robust discussion of this draft report. However, the opinions I express above are personal and not those of the ATSC committee.<br><br>Jeff Farmer<br>Chair, ATSC<br>St. Helena | Thank you for your comment. Please see Response #21 (transportation improvements) & #27 (use of N/A in Ch. 3). This measure has been removed for reasons unrelated to this comment. |

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| 7 | Chris Malan | The City of Napa needs to include nature based solutions to their high ghg emissions. There is a fantastic opportunity for the City of Napa to purchase the 12 acre city parcel near the Napa River, Milliken Creek and Sarco Creek. This is a riparian hub that is historically a high risk flooding area but is superb for a nature based solution to ghg sequestration, groundwater percolation and flood conveyance. The owner is willing to sell at a fair market value. This property can be seen as a multi-objective opportunity to help with ghg emissions and there are numerous grant opportunities to help purchase this property. The City of Napa has few options for nature based solutions to their highest ghg emissions in the county. By purchasing this property helps solve many flooding issues and serves spectacularly the public good, nature preservation and neighborhood health safety and welfare. | Thank you for your comment. |
| 8 | Chris Malan | Are MOUs being signed to show entity commitment to collaborate throughout jurisdictions between the cities and the county? If not, why not? We want substantive collaborations to reduce substantially reduce ghg emissions. | Thank you for your comment. The Climate Action Committee's Joint Power's Agreement serves this purpose. |
| 9 | Anonymous | Really interesting to see the breakdown by sector and region. | Thank you for your comment. |
| 10 | Celeste Mirassou | Looking forward to an explanation of the change in goal to be climate neutral by 2030 to 2045 especially considering climate emergencies declared by each municipality. | Thank you for your comment. See Response #3 (GHG reduction target dates). |
| 11 | Chris Benz | What value was selected for the 2019 level of carbon sequestration and how was it selected? The carbon sequestration inventory reported a minimum value of 5347 MTCO2e/yr to a maximum value of 1,295,292 MTCO2e/yr. In other words, what value was used to calculate when carbon neutrality is reached. | Thank you for your comment. Please see Response #13 (carbon sequestration) . |
| 12 | L | I love the list and the bolded text here | Thank you for your comment. |
| 13 | Bill | It seems like a climate alarmist has created this five-point statement. It's aggressive and offensive. Why? For years (decades really) we have been told we need to do more to care and protect the environment... recycle, drive fuel-efficient cars or EV's, do our part to ensure there is clean air and clean water, etc. Fine as it is a reasonable request. Yet some people, especially elected "leaders" and progressive climate activists are telling us it's not enough. First there was the threat of Global Warming. Then it changed to Climate Change. Now some say it is a Climate Emergency or a Climate Crisis. I'm no denier-- I do my part and more-- but climate facts have become too muddled in the politics that have overtaken the conversation. Trying to ban gas stations (which Napa has enough of anyhow) and drive-thrus, and forcing people into Electric Vehicles (there are NOT ENOUGH CHARGING STATIONS) is government overreach. This draft plan is far too ambitious, not practical and expensive to most people who live and work in our beautiful Napa County. Maybe some elements might work but not all of it. By the way, the valley and our nation was a lot more polluted 50 to 100 years ago. Society has made great progress in that regard. But it's a shame those with an apparent active interest in climate affairs don't seem to be satisfied with those strides-- and probably never will no matter what is accomplished.<br>I hope some good common sense comes from this draft plan. We need more of that and not extreme alarming "sky is falling" talk. | Thank you for your comment. |
| 14 | Regina Brinker | The fires' fatalities are not acknowledged. | Thank you for your comment. Plan text has been revised. |
| 15 | Jeffrey Farmer | Can't find the appendices. Would like to download the document as a pdf as well. | Thank you for your comment. |
| 16 | Anonymous | Curious where emissions from equipment used for fuel treatments (masticators, chippers, chainsaws, etc) is included, in off-road equipment or ag? County, NCFF, and private projects have increased considerably in the last 5 years, and maintenance of them will continue. | Thank you for your comment. Please see Response #15 (off-road equipment). |
| 17 | Jeffrey Farmer | What about emissiions from wildfires? Are they accounted for elsewhere? | Thank you for your comment. Please see Response #30 (controlled burns & wildfire emissions). |

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| 18 | Napa County Resource Conservation District (Napa RCD) | To develop this value, the report references the Regional Carbon Stock Inventory Report (which itself references the California Natural and Working Lands Carbon and Greenhouse Gas Model) for determining the potential carbon sequestration in Napa County. This report uses very generalized estimates for the amount of carbon already in the soil and the potential rate for carbon capture through sustainable ag management practices.<br>From the Regional Carbon Stock Inventory Report and the California Natural and Working Lands Carbon and Greenhouse Gas Model: “carbon sequestered by vegetation and soils on natural and working lands ranges between a minimum of 5,347 MT CO2e/year (without soil conservation practices) and a maximum of 1,295,292 MT CO2e/year (with soil conservation practices.” “Soil conservation practices are based on a tomato-cotton rotation with cover crop and/or reduced tillage in San Joaquin Valley. And maize-tomato with cover crop or cover crop and composted manure in Sacramento Valley. Since there are no studies of cover crop, reduced tillage, or composting in the Delta region, the benefit or difference between managed and unmanaged soil carbon flux from the non-Delta regions (0.40 ± 0.2 Mg C ha-1 y-1) was added to the Delta soil C flux (-2.82 ± 2.51 Mg C ha-1 y-1) to estimate the managed soil carbon flux. The Delta uncertainty range represents the propagated error of the non-Delta benefit and Delta soil C flux.” These conditions are very different to the way sustainable farming is implemented in Napa.<br>Estimating carbon sequestration is highly challenging, and model results may serve only as a starting point for predictions. It should be clearly stated in the document, so readers understand the limitations of these estimates. Ideally, a study should be carried out in Napa, similar to those in the San Joaquin and Sacramento Valleys, to provide more accurate estimates of potential carbon sequestration and to allow for long-term validation.<br>The plan should include a strategy for the long-term validation of the soil carbon sequestration potential. | Thank you for your comment. Please see Response #7 (equity & affordability), #14 (soil carbon sequestration), and Action AG-3-G . |
| 19 | Anonymous | What is the expected lifespan you estimate on current equipment in use? This is a significant reduction estimated by 2030. The transition to electric equipment may be easier for landscape crews, but is not as feasible for tree care and forestry crews. | Thank you for your comment. See Response #16 (off-road equipment). |
| 20 | Susan Crosby | Well put, NCRAA plan writers: It's real, it's us, and science agrees. Let us not permit backsliding on our commitment to the highest level of action our county can take to limit greenhouse gases. We only get one chance to save what can still be saved of the natural world and its frankly marvelous plants and creatures -- including humans, who, on a good day, aren't so bad.<br>Please assure no new gas stations are built, that plastic and single use food ware will be regulated and eliminated, that locals and visitors will learn the importance -- and the relative ease -- of not wasting resources (fast fashion, food waste), make a priority of water conservation and capture, continue to construct bike lanes and public transportation (a rail extension to join the SMART train system in Sonoma? Dream big and act efficiently to insure this beautiful valley will be safe in the future.<br>Thank you,<br>Susan Crosby | Thank you for your comment. |
| 21 | Napa RCD | This sentence should be clarified --- carbon sequestration is not directly linked to emission reductions but can cancel out emission numbers. | Plan text has been revised. |
| 22 | EW | Why not include strategy to plant trees on SW side of schools and public buildings? Shade on buildings in the afternoon when cooling demand is highest reduces reliance on other energy sources for cooling. Though there is inclusion of topic urban forestry in measure AG-5, this is a simple and impactful method that you can relate to energy efficiency of existing buildings. Schools especially have significant amounts of open space around the buildings (ie. space for trees), hot blacktop, and kids/ teachers/ parents who would appreciate shade. | Thank you for your comment. Plan text has been revised. Please see Action AG-5-D. |
| 23 | Patrick Costello | Recommend changing WW-4 to "Reduce Non-Residential Water Use and Ensure Efficiency in New Development" (as detailed in relevant section below). | Thank you for your comment. Plan text has been revised. |
| 24 | Patrick Costello | Add "and" so Strategy is "Water Use Efficiency and conservatin" | Plan text has been revised. |
| 25 | Patrick Costello | Change Strategy name to "Water Education, Awareness, and Behavior Change". Water Loss was covered in previous strategy/measure. | Plan text has been revised. |

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| 26 | Chris Malan | Napa County has deforested most of the valley floor and over 55,000 acres of forested landscapes for the development of vineyards. Each year new vineyard projects are approved for more vines in our forests. There should be no more net loss of forests in Napa County for more wine grapes. Forests are the lungs of our earth and now scientists have studied how forests are more than the lungs of our earth but the immune system of our planet to keep us healthy because this is where biodiversity lives that keeps landscapes healthy to live in. Deforestation is a moral trepidation against the planet for multiple reasons including exacerbating catastrophic flooding seen more and more around the planet due to climate change increasing large storm events. Heavy rains and deluge comes with a vengeance through deforested watersheds causing flash flooding, destruction of life and property. This is occurring with higher frequency in more watersheds throughout countries with great loss of life and property. The Napa River watershed is a narrow watershed geologically. Deforestation combined with climate change is now a formula for disastrous flooding that no flood wall or levee built by the Army Corp of Engineers can mitigate. Add wildfire damage to our landscapes and tree mortality (the Supervisors have declared a tree mortality emergency) on top of deforestation makes this situation even worse. This concern needs to be added with strategies to address it. | Thank you for your comment. Loss of trees are currently under CEQA with mitigation measure of 3:1 replacement. |
| 27 | Chris Malan | It is confusing to note N/A in the Table 3.1 for 2030, 2035 and 2045 categories. All of the AG strategies to reduce ghg listed in the Table 3.1 should be actionable instead of the County saying N/A. Why isn't there a strategy for reducing agricultural burning? The practice of burning ag green debris needs to stop as it directly turns ag green waste into black carbon emissions spewing large particles in the air causing breathing problems for the communities not to speak of all the high carbon emissions that are discharged into the air and atmosphere and a direct cause of climate change. Mulching and turning green waste back into the soil creating a carbon sink, adding moisture and nutrients to the soil is a much better option than burning. It is highly irresponsible of the wine industry to produce more carbon in the air during the growing of grapes for alcohol, to burn green waste creating huge amounts of ghg emissions. A ghg reduction strategy must be added to the NCRCAAP to eliminate ag burning. If the County ignores, putting this in this planning document it is negligence and not in the interest of the public's health safety and welfare to promote a forthright NCRCAAP. | Plan text has been revised. Please see Response #27 (use of N/A in Ch. 3) and text updates to Action AG-3-B. |
| 28 | Anna Britain | We want to underscore the critical importance of measures AG-3 through AG-7. This is why we redeveloped our Napa Green Vineyard standards in 2021 to focus on regenerative agroecosystem management, which includes an element on Forest Management. | Thank you for your comment. |
| 29 | Anna Britain | Please note that Napa Green does winery energy audits as a part of our required “Integrated Resource Assessments,” where we baseline and track energy use and provide recommendations to improve efficiency. We would be happy to be added as a Partner here. | Thank you for your comment. |
| 30 | Anna Britain | While it is important to list all of the potential partners, we would suggest somehow acknowledging that Napa Green is the only boots on the ground program providing hands on technical assistance. | Thank you for your comment. |
| 31 | Mark | Use the Napa County Climate Challenge app to help educate and encourage action at the individual level. https://napacountyclimatechallenge.org/ | Thank you for your comment. |
| 32 | Anna Britain | Napa Green is the lead partner with county wineries to reduce building emissions. We’ve helped more than 20 of our members opt in to MCE’s Deep Green 100% renewable electricity program, providing additional credit and recognition for this measure. We also help keep wineries informed of available rebates for energy efficiency improvement and renewable energy. | Strengthening and supporting industry partnerships are a priority for the RCAAP implementation process. |
| 33 | Napa Valley Transportation Authority (NVTA) | Suggest that this be split into a short-term Action that addresses discretionary land use and development, while also recommending greater coordination across jurisdictions and in partnership with NVTA around monitoring/reporting on TDM programs. Retain Long-term Action addressing future Travel Behavior Studies by NVTA. | Thank you for your comment. Plan text has been revised. |
| 34 | NVTA | Suggest that year and N/A be replaced with brief copy eg: "Reduction not quantified" for all Measures where GHG Reduction Potential was not analyzed. | Plan text has been revised. Please see Response #27 (use of N/A in Ch. 3). |
| 35 | NVTA | Suggest removing this example, as it is a confusing niche case, and more specific examples are provided in following sentence. | Plan text has been revised. |
| 36 | NVTA | Request that "along key arterials & collectors" be replaced with "corridors". While arterials and collectors are the primary routes used by transit, due to the nature of local street networks, many routes must also use some local streets where application of treatments consistent with Transit First priorities may enhance the ridership experience or reduce delays without significant impact on adjacent land uses or other road users. | Plan text has been revised. |
| 37 | EW | Within city of Napa, a significant number of cars are on the road to shuttle children to/from school every day. These vehicle miles could be avoided. Evaluate open-enrollment and bus policies? | Thank you for your comment. |
| 38 | Robert | Why don't wineries reuse the water in their fields?<br>Why aren't they connected to wastewater now?<br>If the water is polluted, reduce the pollution! | Thank you for your comment. |

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| 39 | Anna Britain | One consistent feedback we hear from our Napa Green members attempting to install or expand EV charging infrastructure are challenges navigating the ADA permitting requirements. Is there a way to streamline this process for certified vineyards and wineries? | Thank you for your comment. ADA regulations are interpreted by each jurisdiction. |
| 40 | Regina Brinker | Include electric bike charging stations in the plan to increase EV charging stations. | Thank you for your comment. Plan text has been revised. Please see Measure TR-10. |
| 41 | John Gleazer | In a keyword search, for example "ZEV", the context is shown in 3-21 with portions of the text on the left side truncated, and so the full text is not visible. Tried 3 different browsers with the same result. | Thank you for your comment. |
| 42 | Robert | Hydrogen can be Explosive! | Thank you for your comment. |
| 43 | Robert | Should be 100% in 2025! | Thank you for your comment. |
| 44 | Regina Brinker | Provide incentives for farmers to use electric tractors. | Thank you for your comment. Pleas see Action AG-1-A. |
| 45 | Regina Brinker | Provide rebates/incentives to encourage residents to purchase E-bikes, and to use those bikes to commute to work and other activities. | Thank you for your comment. Please see Action TR-11-A. |
| 46 | Bill | Napa does have enough gas stations, but is a ban necessary? What the community needs... what the nation needs... are more EV charging stations. I feel the day will come when charging a car will be as quick as fueling up. That would be great progress, but that's some years in the future. | Thank you for your comment. Please see Measure TR-3. |
| 47 | Robert | YES! | Thank you for your comment. |
| 48 | Robert | Does creating and transporting this diesel use fossil fuels?<br>It might be reusing bio-matter, but it's not renewable.<br>What are the downsides? What are the exhausts? | Thank you for your comment. Please see Response #20 (renewable diesel). |
| 49 | NVTA | Change to 2026. | Plan text has been revised. |
| 50 | NVTA | Revise sentence to read, "NVTA is currently developing a Countywide Active Transportation Plan."<br><br>Context: This is a first-ever plan for Napa County, building on a 2019 Countywide Bicycle Plan, and 2016 Pedestrian Plan, as well as 2023 Vision Zero Plan. AT Plan is expected to be adopted in early 2026 by NVTA Board, and subsequently by jurisdictions. | Plan text has been revised. |
| 51 | NVTA | Request change to "...NVTA and local jurisdictions efforts in securing funding to implement projects..."<br><br>While NVTA developed the Vision Zero Plan and can support efforts to identify or program funds for this work, jurisdictions are largely the lead on implementing projects and programs. | Plan text has been revised. |
| 52 | NVTA | Request change to "efforts to develop a countywide data collection program and publish biennial reports on progress toward..."<br><br>Biggest challenge in Active mode share tracking is lack of accurate data, particularly for small jurisdictions. Revised text is more feasible to implement and consistent with NVTA's capacity and ongoing efforts to partner with Jurisdictions on data/counts for mode and programmatic efforts, and GIS data tracking for infrastructure. | Plan text has been revised. |
| 53 | Robert | One problem is that Hwy. 29 has unconnected sidewalks and bikeways. | Thank you for your comment. |
| 54 | Regina Brinker | Support policy and projects that promote safe active transportation routes across a wide geographic area. | Thank you for your comment. See Measure TR-10. |
| 55 | NVTA | NVTA has strong concerns about the metric identified (miles traveled), and inconsistency between mode share goals and target years identified in this plan, vs draft Countywide Active Transportation Plan. Active transportation is preferred to be measured on a % of trips basis (eg: 5% of all trips by bicycle), recognizing that even a small number of long vehicle trips will severely hinder progress toward targets when using miles traveled. NVTA requests additional discussion with CAC staff and Ascent to ensure that metrics used in all countywide plans are consistent. | Plan text has been revised. |
| 56 | NVTA | Suggest change to "State/regional entities, NVTA, and local jurisdictions" to not exclude other funding agencies, such as the Bay Area Air District (formerly BAAQMD). | Plan text has been revised. |
| 57 | NVTA | Request change to read "efforts to expand and secure additional funding to provide active transportation mobility..." | Plan text has been revised. |
| 58 | NVTA | All Napa County residents and employees are currently eligible for local TDM program V-Commute operated by NVTA, which provides financial incentives, encouragement, and support programs for commuters. Not clear what the parameters of the "local TDM program" might be. Request additional discussion with CAC staff to clarify and ensure TDM targets are clearly defined and achievable. | Plan text has been revised. Please see Response #22 (commuter benefits program). |

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| 59 | NVTA | Throughout document, replace BAAQMD with Bay Area Air District. | Plan text has been revised. |
| 60 | NVTA | Add MTC as Partner with Air District, as they are a funding partner on regional TDM programs, including vanpool subsidies. | Plan text has been revised. |
| 61 | NVTA | Suggest a Long-term goal consistent with statewide efforts to evaluate and potentially implement alternatives to gas tax, such as VMT or Road Use Charge. | This measure has been removed for reasons unrelated to this comment. |
| 62 | NVTA | Suggest rewriting to read "In partnership with NVTA, evaluate opportunities to develop a visitor..." | Thank you for your comment. |
| 63 | Robert | Wine Train, and a commuter train, from Vallejo to Calistoga.<br>Connect with SMART and AMTRAK, Solano transit.<br>ZEV express bus, shuttles, on Hwy. 29. | Thank you for your comment. |
| 64 | Bill | Regarding local transportation: implement a fee for miles traveled? Doesn't that sound like a Socialist idea? A very bad consideration. I do appreciate plans to create less congested intersections especially along Highway 29. The roundabout at Soscol Junction turned out nice and hope to soon see development of similar plans for the turnoffs to Sonoma and Jameson Canyon respectively. They are long overdue. | Thank you for your comment. |
| 65 | NVTA | Suggest that unbundling be moved to short-term action. Consider revision to reduce policy specificity, allowing for greater local discretion regarding appropriate land uses, development size/intensity, etc. | Plan text has been revised. |
| 66 | Regina Brinker | Add requirements that multi-family buildings include secured bicycle parking. | Thank you for your comment. See Action TR-10-D. |
| 67 | Regina Brinker | Along with limiting parking spaces, increase the number of secure bike parking spaces. | Thank you for your comment. See Action TR-10-D. |
| 68 | NVTA | Suggest adding a short-term action that supports expansion of countywide Safe Routes to School education and encouragement programs to reach all K-12 students in Napa County. | Plan text has been revised. See Action TR-14-C & Action TR-14-F. |
| 69 | EW | Based on recent comments on various outlets, restriping roads and creating alternative traffic and bike lane alignments (as on 1st St and Brown's Valley Rd) is not well received by the community. A comprehensive plan to develop bike corridors on protected pathways separated from traffic is needed. Hiding bicyclists behind parked cars creates poor visibility for both bicyclists and drivers. A few E-W bicycle corridors would be beneficial to get residents from neighborhoods into central part of city of Napa, and onto vine trail. Other countries are way ahead of us in bicycle use by people of all ages, and integrate pathways into city planning. Do we also need to consider the different impact of e-bikes vs. conventional cyclists? e-bikes travel fast, and are much heavier in the event of an accident, should they be in the same bike lanes with other cyclists? | Thank you for your comment. |
| 70 | Robert | Can the truck refrigerators be plugged in? Other delivery trucks, vans and cars also idle. | Thank you for your comment. |
| 71 | Anna Brittain | Another short-term action we would recommend would be to work with local waste management agencies and CalRecycle to support the establishment of glass washing infrastructure in Napa County, enabling wine bottle reuse to become a reality. There is a group, Revino, who has successfully established glass reuse in Oregon and they are interested in bringing their services to Napa, but the cost of establishing glass washing infrastructure is an impediment. | Thank you for your comment. |
| 72 | Anna Brittain | Note that Napa Green works with wineries to baseline and track waste diversion, providing guidance and resources for maximizing recycling and composting, and connecting with UVDS and NRWS for trainings. Our RISE Symposium also led to the creation of the Zero Waste Collective. | Thank you for your comment. |
| 73 | Kevin Miller | I head the Solid Waste/Recycling (SWR) division for the City of Napa. The basic draft RCAAP plan for SW measures are fine at a high level but I think it might be a good idea to documents policies and programs already in place for jurisdictions in Napa County. For the City of Napa, three specific policies and/or programs may be of particular note. First, the Disposal Reduction Policy (Council Resolution R2012-100) was adopted in 2012 and set a City target goal of 75% (or higher) for reduction of landfill disposal. Second, the City adopted a very ambitious Construction & Demolition Debris Recycling Ordinance in 2010 (O2010-18) that requires a minimum level of 50% recycling (without any credit for Alternative Daily Cover - or ADC - at landfills) that is more stringent that the current Statewide CalRecycle requirement of 65% (that provides full "diversion" credit for ADC application at landfills). Third, the City is fully committed to full compliance with SB 1383 program requirements and is ahead of most jurisdictions throughout California in this regard (having accepted food scraps and soiled paper for composting collection systems since 2015). I will send an email to City/County staff with more information and relevant attachments for consideration in the RCAAP. - KM | Thank you for your comment. Please see Community Partners & Resources section in the RCAAP Storymap. |
| 74 | Regina Brinker | Enforce SB1383 which requires that all residential and public buildings have green waste collection, and divert 75% of green waste from landfill to green waste collection sites by this year. This effort isn't noticed across the Valley. Do the schools have green waste collection programs in place? I can refer you to a leader who runs this program in the Livermore Valley Joint Unified School District. | Thank you for your comment. Please see Action SW-3-C. |

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| 75 | Anna Brittain | This could have the additional value of helping to provide an alternative to fire fuel thinning and wood waste being burned or hauled out of the county, adding to black carbon and transportation emissions. Growers are increasingly interested in piloting biochar, so there is a ready demand for a local source. | Thank you for your comment. |
| 76 | Patrick Costello | Recommended Applicable Jurisdictions change to "All" as there are several current and potential future recycled users within city limits (e.g., Napa Pipe Project, Napa Valley Commons, Napa Valley College, South Napa Marketplace). | Plan text has been revised. |
| 77 | Anna Brittain | Note that often when we talk to growers about using recycled water for vineyard irrigation there are concerns about quality, so part of expanding water reuse has to be clear communication and reporting on water quality. | Thank you for your comment. |
| 78 | Patrick Costello | "(including grants)" | Plan text has been revised. |
| 79 | Patrick Costello | "and" | Plan text has been revised. |
| 80 | Patrick Costello | "through" not "by" | Plan text has been revised. |
| 81 | Patrick Costello | NCFCWCD is not the relevant partner. I recommend listing:<br>- Napa County Resource Conservation District<br>- California Water Efficiency Partnership | Plan text has been revised. |
| 82 | Patrick Costello | "indoor" | Plan text has been revised. |
| 83 | Patrick Costello | "for 2030 and beyond" | Plan text has been revised. |
| 84 | Patrick Costello | ", while achieving efficient outdoor residential water use." | Plan text has been revised. |
| 85 | Robert | Stop new wineries and urban sprawl, there won't be enough water! | Thank you for your comment. |
| 86 | Patrick Costello | Delete this bullet item. Issue of grant funding incorporated in suggested edit in WW-3-B lead sentence above. | Plan text has been revised. |
| 87 | Patrick Costello | "grant" | Plan text has been revised. |
| 88 | Patrick Costello | "(AMI)" | Plan text has been revised. |
| 89 | Patrick Costello | Delete. Moving WW-7-U to WW-4 covers this issue. | Plan text has been revised. |
| 90 | Patrick Costello | Under AB 1572, it is not the governing jurisdictions that certify compliance every three years. It is all owners of affected commercial, industrial, institutional, and HOA properties with >5,000 square feet of irrigated area that directly certify compliance with the State Water Board. | Plan text has been revised. |
| 91 | Patrick Costello | "and" | Plan text has been revised. |
| 92 | Patrick Costello | To be precise in this section, AB 1572 does not require the elimination of non-functional turf. It prohibits the use of potable water for its irrigation. Therefore, areas with recycled water available may use that to irrigate. Also, non-functional turf zones containing dependent trees will likely also be allowed to continue irrigating with potable water to maintain tree health. | Plan text has been revised. |
| 93 | Napa RCD | We recommend using these public landscapes as demonstration sites to encourage adoption of practices and would like to see this specifically mentioned. | Plan text has been revised. |
| 94 | Patrick Costello | This is way too narrow a measure. I strongly recommend making it analogous to WW-3 by changing WW-4 to "Reduce Non-Residential Water Use and Ensure Efficiency in New Development".<br>Rewrite opening paragraph to encompass this change, avoiding narrow focus on municipal landscaping, which is covered in the actions.<br>Relocate numerous WW-7 Actions to this measure instead:<br>Short-Term WW-7-A, WW-7-B, WW-7-E, WW-7-F, WW-7-G, WW-7-H, WW-7-I, WW-7-K<br>Long-Term WW-7-R, WW-7-S, WW-7-T, WW-7-U, WW-7-V, WW-7-W, WW-7-X, WW-7-Y, WW-7-Z | Plan text has been revised. |
| 95 | Patrick Costello | NCFCWCD is not a relevant partner and can be deleted form this list. | Plan text has been revised. |
| 96 | Napa RCD | Napa RCD's name is mentioned inconsistently through plan.<br>Sometimes we are referred to as Napa County RCD, sometimes Napa County Resource Conservation District, sometimes Napa RCD. We prefer to be mentioned first as Napa County Resource Conservation District, and then through the remainder of the document as Napa RCD. | Plan text has been revised. |
| 97 | Patrick Costello | Edit Targets to reflect broadened Measure as recommended above.<br>Again, AB 1572 does not mandate the elimination of non-functional turf. It addresses irrigation, but certainly does incentivize replacing turf with water-wise plants. | Plan text has been revised. |

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| 98 | Patrick Costello | Based on broadening this measure as recommended above, Partners list should include:<br>Napa RCD<br>UCCE Master Gardeners<br>Napa County Green Business<br>Napa Green Certified Winery<br>California Water Efficiency Partnership | Plan text has been revised. |
| 99 | Patrick Costello | Change "public works" to "municipal" | Plan text has been revised. |
| 100 | Patrick Costello | Remove last sentence, as WW-7-E will be deleted from WW-7. | Plan text has been revised. |
| 101 | Patrick Costello | WW-4-C and WW-7-E should be merged together so that the 2027, 2028, and 2029 deadlines are all included. | Plan text has been revised. |
| 102 | Patrick Costello | Recommend eliminating "native". Water-wise landscapes do not have to be exclusively natives to be appropriate for our climate. | Plan text has been revised. |
| 103 | Patrick Costello | "(e.g., Qualified Water Efficient Landscaper (QWEL) or ReScape certification). | Plan text has been revised. |
| 104 | Patrick Costello | Delete "public works" | Plan text has been revised. |
| 105 | Patrick Costello | "and" | Plan text has been revised. |
| 106 | Patrick Costello | Remove this last sentence, as it is not applicable to this measure. | Plan text has been revised. |
| 107 | Anna Brittain | Water use efficiency is one of six elements of both our Napa Green Vineyard and our Winery standards, and addresses many of the prohibitions and opportunities mentioned. | Thank you for your comment. |
| 108 | Patrick Costello | Delete NCFCWCD. There are no external partners as enforcement is handled by staff of each jurisdiction. | Plan text has been revised. |
| 109 | Robert | Construction and warehouses should use recycled water, not potable! | Plan text has been revised. |
| 110 | Patrick Costello | 26.8 | Plan text has been revised. |
| 111 | Patrick Costello | 16.4 | Plan text has been revised. |
| 112 | Patrick Costello | "and" | Plan text has been revised. |
| 113 | Patrick Costello | City of Napa target is 26.8 | Plan text has been revised. |
| 114 | Patrick Costello | City of American Canyon target is 16.4 | Plan text has been revised. |
| 115 | Patrick Costello | Delete NCFCWCD. Add CA-NV Section of American Water Works Association. | Plan text has been revised. |
| 116 | Patrick Costello | Adjust this sentence based on corrected target numbers below. | Plan text has been revised. |
| 117 | Patrick Costello | Change "Water Loss" to "Water Education, Awareness, and Behavior Change". Water Loss was covered in previous measure/strategy. | Plan text has been revised. |
| 118 | Anna Brittain | Napa Green works with vineyards and wineries to baseline and track water use, doing water audits. | Thank you for your comment. |
| 119 | Patrick Costello | Delete NCFCWCD from Partners list. | Plan text has been revised. |
| 120 | Patrick Costello | "(including grants)" | Plan text has been revised. |
| 121 | Patrick Costello | Retain individual Short-Term Actions here or relocate them to WW-4 as listed in earlier comments. | Plan text has been revised. |
| 122 | Patrick Costello | In conjunction with my recommendations for WW-4, I strongly recommend making this measure WW-7 analogous to SW-3 and BE-6 by changing it to "Empower Community to be Water-Efficient".<br>This measure should retain only the following Actions:<br>WW-7-D, WW-7-J, WW-7-L, WW-7-M, WW-7-N, WW-7-O, WW-7-P, WW-7-Q and add one new long-term action as indicated below in that section.<br>As mentioned earlier in WW-4, the following Actions should be relocated to that measure instead:<br>Short-Term WW-7-A, WW-7-B, WW-7-E, WW-7-F, WW-7-G, WW-7-H, WW-7-I, WW-7-K<br>Long-Term WW-7-R, WW-7-S, WW-7-T, WW-7-U, WW-7-V, WW-7-W, WW-7-X, WW-7-Y, WW-7-Z | Plan text has been revised. |
| 123 | Anna Brittain | We want to share particular support for the concept of “Cash for Grass,” as this will support and incentivize some wineries to reduce or eliminate turf and convert to native, drought-tolerant landscaping. | Thank you for your comment. |
| 124 | Patrick Costello | Delete "offer rebates and incentives to the community for water-efficient solutions, establish water-efficient landscaping requirements, and". | Plan text has been revised. |
| 125 | Napa RCD | The GSA is a Partner and is doing a lot of planning related to this topic in agricultural lands. This should be mentioned here. | Plan text has been revised. |
| 126 | Patrick Costello | Delete | Plan text has been revised. |

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| 127 | Anna Brittain | The Napa Green vineyard team is also trained in the CalPoly protocol to conduct irrigation Distribution Uniformity assessments, and provides this service to vineyards. | Thank you for your comment. |
| 128 | Patrick Costello | "grant" | Text has been revised. |
| 129 | Anna Brittain | Napa Green works with growers to baseline and track fuel use, and calculate the associated emissions metric. | Thank you for your comment. |
| 130 | Napa RCD | We suggest that there should be mention of sustainable water management in this section. Water conservation measures in agriculture translate into significant reductions in energy use, which is relevant for both diesel and electric pumps. This is partially mentioned under Measure Drought-2. | Plan text has been revised. |
| 131 | Anna Brittain | Napa Green regularly shares available incentives with our members, including CORE, MCE, etc. | Thank you for your comment. |
| 132 | Evelyn | Possibility to add USDA NRCS as a partner, NRCS provides financial support to farmers/ranchers to upgraded old equipment to new models with lower emissions, or go electric. | Thank you for your comment. Plan text has been revised. |
| 133 | Napa RCD | We suggest adding a short term-action focused on Spanish training for farmworkers assisting in the implementation of carbon farming practices.<br>Suggest mentioning emissions associated with burning of dead vines or the application of lime.<br>Suggest mentioning emissions associated with the lack of implementing sustainable farming practices. Excessive tilling and poor nutrient management generate a substantial amount of GHGs.<br>Suggest adding CDFA as partner - they have been providing cost-share grants to farmers to implement CFPs. | Thank you for your comment. Plan text has been revised. Please see Action AG-3-E. |
| 134 | Evelyn | USDA Natural Resources Conservation Service (NRCS) provides financial support (through USDA Farm Bill programs) to farmers and ranchers to install carbon farming practices, and could be listed as a partner. | Plan text has been revised. |
| 135 | Anna Brittain | Napa Green's vineyard team has been trained in the Carbon Cycle Institute protocol to develop Carbon Farm Plans. Each of our certifying vineyards receives a custom regenerative Carbon Farm Plan and has to commit to implement at least 2-3 practices each 3-year certification cycle. Our Vineyard Program Manager is also a Technical Assistance Provider and provides planning and implementation support to members. It is particularly important that we also be listed as a partner here. | Plan text has been revised. |
| 136 | Anna Brittain | Facilitating access to funding and developing new funding mechanisms is critical, as many growers need financial support and incentives to transition to regenerative practices, and state and federal funding support is increasingly limited. | Thank you for your comment. |
| 137 | Anna Brittain | Napa Green regularly organizes events and workshops to provide education and training on regenerative carbon farming and soil management best practices. | Thank you for your comment. |
| 138 | Chris Malan | Vineyards are suppose to have at a minimum 80% year around cover crop as part of their General Wastewater Discharge Requirement to meet sediment Total Maximum Daily Load allocations. Yet, many vineyards still do year around tilling and no native cover crops. There is so much left to be done by the majority of wine grapes growers such as: no ag burning but rather mulching of green waste; riparian restoration with healthy buffers of at least 35ft top of bank; hedge rows promoting insect biodiversity; organic farming, dry farming, crop rotation methods if pulling vines where the opportunity arises to enrich the soil with other crops grown. | Thank you for your comment. |
| 139 | Anna Brittain | Please leverage Napa Green's list all of our certified growers on our website: https://napagreen.org/participating-members/ All of these growers have Carbon Farm Plans and are implementing some regenerative, carbon farming practices. | Plan text has been revised. See Community Partners & Resources section of the RCAAP Storymap. |
| 140 | NVTA | Add NVTA to Partner on this Measure. Consider expanding Action AG-5-B to prioritize expansion along transit and active transportation corridors, seeking to capitalize on co-benefit of encouraging alternative transportation and reducing climate impact on individuals who rely on active/transit modes. | Plan text has been revised. |
| 141 | Robert | Yes! Native trees and plants helps habitat! | Thank you for your comment. |
| 142 | EW | Please look into Green Schoolyards America as a partner to implement this measure on our public school yards.<br>https://www.greenschoolyards.org/tree-canopy-equity<br>Their goal is to have 30% of the student zone shaded. Based on the CA schoolyard tree canopy equity study map on their website, all but 3 schools in Napa County currently fall below 25%, and 11 fall below 5% shaded in Napa County. Schoolyards have a large amount of open space (= great opportunity to make a difference), and a population eager to learn (=great opportunity to combine actions with education on climate resilience). | Plan text has been revised. |

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| 143 | Anna Brittain | One of six elements of Napa Green Vineyard standards is “Forest Management for Health and Fire Resilience.” There are significant areas of private forested lands that are not being managed because it is cost-prohibitive. We communicate opportunities like the North Bay Forest Improvement Program, but there needs to be significantly more streamlined support for private landowners to actively improve forest health, reducing wildfire risk, increasing resilience, and helping to absorb and store groundwater and replenish aquifers. | Thank you for your comment. |
| 144 | Robert | YES! | Thank you for your comment. |
| 145 | Chris Malan | This effort must be done in collaboration, consultation and coordination with the Mishewal Wappo of Alexander Valley to seek and use for their indigenous cultural knowledge and stewardship of their lands. They should lead this effort with the County paying financial compensation for their cultural and historic knowledge of their homeland landscapes that we stole from them and then largely caused destruction to these indigenous lands. The Wappo are the leaders here and we may follow. | Thank you for your comment. Plan text has been revised. |
| 146 | Anna Brittain | Napa Green is hugely supportive of developing a countywide watershed management and habitat restoration program, and would like to add our insight and expertise to this process. We have identified some member properties with forested lands that would be interested in serving as restoration pilots. | Thank you for your comment. |
| 147 | Anna Brittain | This will be essential as Napa Green has been 50% grant funded, and these funds are disappearing. | Thank you for your comment. |
| 148 | Anna Brittain | It is important to note that through Napa Green's unique regenerative vineyard certification there are greater climate benefits tied to drawdown and carbon sequestration, which exceed emissions reductions. We are focused on working with growers to implement practices that increase soil health, organic matter, and biodiversity such as diverse cover crops, compost, hedgerows, reduced tillage, and pollinator habitat – all of which increases carbon storage. We track Scope 1 & 2 emissions, as well carbon sequestration using the COMET tool. | Thank you for your comment. Plan text has been revised. |
| 149 | Chris Malan | Unfortunately, the vineyard certification does not address the deforestation that takes place when many vineyards are developed. It is hard to see how a vineyard that cuts down the forest can be given a Sustainable Vineyard Certificate. If a vineyard cuts down trees then it extrinsically should be disqualified for a Sustainable vineyard Certificate. | Thank you for your comment. Loss of trees are currently under CEQA with mitigation measure of 3:1 replacement. |
| 150 | Robert | Cattle can also damage the ecosystem, and they should not be on sensitive lands.  Reduce both beef consumption and methane. | Thank you for your comment. |
| 151 | Anna Brittain | This measure needs to include an emphasis on one of the most prevalent and beneficial sustainable livestock practices in Napa County – sheep grazing. There is scientific evidence of the benefits of properly managed vineyard grazing in terms of soil health and natural fertilization. In addition, sheep serve as natural mowers, eliminating emissions from herbicides and tractor passes. Outside of the vineyard, goats can play a valuable role in clearing over-dense forest and woodlands. Regionally relevant sustainable livestock management should be encouraged and incentivized.<br><br>Napa Green provides grazing education, and sustainable sheep grazing is included in our regenerative Carbon Farm Plans. | Thank you for your comment. Plan text has been revised.  Please see Response #24 (sheep grazing). |
| 152 | Napa RCD | The plan should mention that the GSA is working on an incentive program to encourage landowners to delay replanting.<br>•This could result in less water being pumped (less energy use) and the opportunity to enhance soil health in between replanting. | Plan text has been revised.  Please see  Action AG-9-C. |
| 153 | Anna Brittain | Note one of Napa Green's Vineyard standards: “Commit to preserve trees/forest onsite (unless trees need to be removed for safety, including targeted fire fuel reduction). If property is being developed or new vineyards are being planted this must be planned to prevent the removal of mature trees. Submit, in advance, the reasons for removing any trees. Must replant locally where ecologically beneficial (preferably onsite), with native species (oaks with oaks), at a rate of 3:1 (three plantings for every tree removed).” | Thank you for your comment. |
| 154 | Robert | Don't Develop Open Space.  Infill, not sprawl. | Thank you for your comment. |
| 155 | Chris Malan | This picture shows a green grass area, which is a mountain wetland. Napa County does not protect these types of wetlands and allows grazing and vineyards to develop right through them, yet they are huge in groundwater recharge and usually are habitat for rare plants and animals. This plan should have clear guidance for protection of all wetlands as great carbon sequestration sinks. | Thank you for your comment. Plan text has been revised. Please see Measure Flood 4 |
| 156 | Anna Brittain | Suggest emphasizing the economic impact that just a few consecutive days of extreme heat can have for growers. During the heat spikes in 2022 many growers lost 20% or more of their fruit, with some members making no wine that vintage. By increasing agricultural resiliency, creating farms that are better able to weather extremes, we can reduce the severity of losses caused by heat spikes, drought, etc. We need to begin to account for the value of regenerative practices that can reduce or prevent crop losses. | Thank you for your comment. Plan text has been revised. Please see Action All-6.5. |
| 157 | Chris Benz | Where is the key for this map? What amount of sea level rise do the different colors refer to? | Thank you for your comment.  Map view has been adjusted. |

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| 158 | Chris Bez | Is it possible to show current land mass vs current under water? | Thank you for your comment. Map view has been adjusted. |
| 159 | Evelyn | The table in chapter 3 for GHG reduction strategies and measures was in a different format, and listed individual measures. This table for climate adaptation strategies and measures follows a different format, listing the strategy in detail, with just a mention of the # of measures, but not listing measures by name. Should these two tables follow a more consistent format, that may make the information easier to visualize for the reader? These strategies and measures make up much of the document (60 pg of GHG reduction measures, 39 pages of climate adaptation measures), it would be great to more easily locate and search through both sets of strategies/ measures. Links in each table to take you to the start of each strategy, or each measure would be great. | Thank you for your comment. Table 5.1 has been revised. |
| 160 | Regina Brinker | Put effective policies in place that support the climate adaptation strategies. | Thank you for your comment. |
| 161 | Chris Malan | The Napa River watershed is a narrow watershed highly incised due to land uses such as deforestation for vineyards high in the watershed. There are approximately 55,000 acres of sloped vineyards in Napa County all of which have caused deforestation or other vegetation removal and erosion control plans have been installed as piping under the sloped vineyards (anything over 5% slope) to capture storm runoff and divert it to the nearest stream to help prevent erosion at the vineyard site. When you remove the natural vegetation and install underground pipes to capture stormwater, you are removing rainfall that would have naturally percolated through the natural vegetation at a slow rate recharging the aquifers and providing soil. moisture throughout the year. Removing this percolating groundwater and discharging this water through underground pipes to a discharge point in the watershed off site of the developing vineyard causes increased rate of flow or discharge of stormwater to the receiving stream, creek or river. Throughout the Napa River watershed this 'erosion control' infrastructure is discharging increased rate of storm water eventually discharging from all over the watershed to the Napa River. There are an estimated 35K vineyards on the valley floor and approximately 55K in the mountains or any sloped vineyard in the watershed over 5% slope has erosion control pipe infrastructure discharging to the Napa River. This cumulative increased rate of flows of stormwater to the Napa River is causing the river to carry more storm water than it can hold there-by causing all this increased stormwater flows have erosional forces which collapse the stream and river's banks and cuts down into the bed of the stream and river driving millions of tons of sediment into the River and eventually the San Francisco Bay. All of this eroded soil will deposit this sediment throughout the watershed covering up spawning gravels for salmonids, making the river more shallow in places where the sediment plugs or drops of the flowing water which causes a more shallow and warming river. Many reaches of the Napa River are seriously incised which is steep banks from the erosion of increased rate of flows and then other parts of the river are really shallow because sediment has dropped in the river from all the eroded banks and bed areas of the river. This sets up a disaster of huge magnitude given climate change. If we have deluge the shallow parts of the River will not carry the deluge and this stormwater will jump out of the banks and cause massive flash flooding that can cause death and property damage because people and property will not be able to get out of the way in enough time to do so. The deforestation and vegetation removal so common in vineyard development, prevents groundwater recharge. Not looking at nature based solutions to climate adaptation, is a huge oversight. We must prevent vegetation loss in our watershed so we can help prevent catastrophic flooding, flash flooding, torrents of water and debris damaging property and killing people. We have aging dams like Milliken Dam that are not capable of holding back torrents of water and flash flooding events due to their age and instability determined by the Ca. Division of Dams and Safety. Reservoirs are collapsing all over the world during catastrophic flooding events caused by deluge which is a climate event problem. We must repair and restore our watershed, by planting trees and preventing further tree losses and remove dangerous dams and restore the watersheds thereof. | Thank you for your comment. Plan text has been revised. |
| 162 | Robert | No details. What specific actions will be taken in coordination? | Thank you for your comment. See Chapter 6: Implementation and Monitoring. |
| 163 | NVTA | Add to ALL-5.3 or add a new Action to support development of emergency traffic operations center by NVTA, ensuring all-electric fleet can serve needs of community in evacuation or other emergency scenarios. | Thank you for your comment. Plan text has been revised. See Action All-5.4. |
| 164 | Anna Brittain | It is critical to acknowledge the importance of social sustainability to improving agricultural sustainability. Vineyard stewards need to feel safe, cared for, listened to, and valued in order to be personally invested in going beyond baseline work to support increased sustainability and resilience of agricultural systems. | Thank you for your comment. |
| 165 | Anna Brittain | Agriculture and adjacent ecosystems are all interconnected. Increased biodiversity is essential to agricultural resilience. Farm systems with greater diversity and complexity both below- and above-ground have improved plant nutrient availability, water storage, attract beneficial insects and birds that naturally control unwanted pests, and are better able to adapt to disease and climate pressures. | Thank you for your comment. |

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| 166 | Napa RCD | Consider the role of youth education and workforce development in this and all measures. We encourage a commitment to investing in the knowledge base of this community to carry this work forward through the generations. | Plan text has been revised. See Action All-7.5. |
| 167 | Napa RCD | Please include Napa RCD as partner. All 7.1 should mention habitat restoration more broadly, with focus on wetland, riparian, and wildlife corridors | Plan text has been revised. |
| 168 | Napa RCD | Recommend including Napa RCD as a partner<br>Recommend adding action: "Fire-1.2: Develop a countywide forest health and wildfire resilience vision that assesses current conditions and helps to inform project prioritization and management decisions to improve forest health and wildfire resilience."<br>Co-benefit: Public Health & Well-Being; If recommended Fire-1.2 is included, also add Ecosystem Health | Plan text has been revised. |
| 169 | Evelyn | Include partner USDA Natural Resources Conservation Service | Plan text has been revised. |
| 170 | Napa RCD | Recommend adding Napa RCD as partner | Plan text has been revised. |
| 171 | Anna Brittain | While fire fuel thinning is essential to reduce fire risk, there needs to be a larger focus on investing in cultivating healthier forests, which then reduces the severity of fires, and allows more trees to survive fire events to serve as carbon and water stores. | Thank you for your comment. |
| 172 | Robert | Fuel Reduction = Logging?<br>No Logging! Keep Trees and Forests Alive!<br>Protect Natural Ecosystems and Wildlife.<br>Clear defensive areas next to houses.<br>No logging in non-urban areas. | Thank you for your comment. |
| 173 | Robert | No New Housing in High Fire Zones! | Thank you for your comment. |
| 174 | Napa RCD | We strongly suggest revising this measure and supporting actions, focusing on active forest management and restoring a natural fire regime in our fire adapted ecosystems (rather than focusing specifically on bark beetles). It's important to note that bark beetles are native to our area, and their high presence and subsequent tree die off is closely tied to drought, heat stress, and increased frequency and severity of wildfires in combination with fire suppression and lack of active management over the last ~150 years. This has led to overstocked forests and conifer encroachment in oak woodlands, resulting in unhealthy trees that cannot withstand bark beetle infestations.<br>Measure Fire-5: Enhance forest health and resilience to climate change through active management and monitoring<br>Action Fire-5.1: Identify key metrics of forest health and resilience to track over time, and implement a monitoring program aligned with those metrics.<br>Action Fire-5.2: Plan and implement forest management projects (e.g., weed control, planting, thinning) following best practices, considering future climate conditions, and aligning with natural wildfire regimes.<br>Additional context on proposed change to 5.2: We think it may be more prudent to focus on managing conifer encroachment in oak woodlands and developing reforestation / replanting approaches that consider both historic land types and anticipated future climate. | Plan text has been revised. |
| 175 | Napa RCD | Action Fire-6.2: Acting on preventative measures is often more difficult or inaccessible to low-income individuals and renters. Ideally there would be resources invested in supporting these individuals. | Thank you for your comment. |
| 176 | Napa Valley Transportation Authority | Revise TEMP-2.5 to include reference to transit riders. | Plan text has been revised. |
| 177 | Robert | Yes! | Thank you for your comment. |
| 178 | Napa Valley Transportation Authority | Modify TEMP-3.3 to read "Identify opportunities to expand tree canopy or other shade and provide water refill stations at major transit stops." | Thank you for your comment. |
| 179 | Napa Valley Transportation Authority | Support consistency with NVTA comments provided in AG-5-B re: locations for prioritizing urban tree canopy. | Plan text has been revised. Please see Action TEMP-2.5. |
| 180 | Robert | Yes! | Thank you for your comment. |
| 181 | EW | Would love to see this strategy emphasized at all locations within watershed, and include the impact it will have on other measures/ strategies. When water is channelized and leaves the watershed quickly, there is less infiltration and reduced groundwater, leading to stressed forests, less CO2 sequestration, and higher likelihood of catastrophic fire. The interconnectedness of this with several other measures in the report is not mentioned. Prioritize low-tech, green infrastructure solutions to capture and absorb rainwater, especially in the upper watershed. Start by setting goal that public buildings and schools capture runoff and send it to raingardens/ retention areas on site. Great teaching opportunity for students and public. | Thank you for your comment. |

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| 182 | Napa RCD | While not as prominently featured as woodland or forest restoration, wetlands are acknowledged as contributors to both ecosystem resilience and climate mitigation. Could we do more to set explicit wetland restoration targets (e.g., acres restored by 2030/2045) similar to the numeric restoration goals for forests and woodlands. Frame wetlands as climate infrastructure that not only sequester carbon but also buffer floods, filter water, and provide habitat critical for biodiversity. | Plan text has been revised. Please see Action FLOOD-4.2. |
| 183 | Patrick Costello | Recommend replacing NCFCWCD with Napa RCD | Plan text has been revised. |
| 184 | Napa RCD | We suggest adding a measure focused on Spanish language training and education for farmworkers on sustainable water management and on how to conduct distribution uniformity testing. | Plan text has been revised. Please see Action DROUGHT-4.4. |
| 185 | Patrick Costello | Delete stray "e" | Plan text has been revised. |
| 186 | Napa RCD | We suggest adding a measure that focuses on Investing in demonstration projects to facilitate adoption of best practices<br>This is a comment that applies to many measures that depend heavily on public buy-in | Plan text has been revised. Please see Action DROUGHT-4.3. |
| 187 | Patrick Costello | "US" | Plan Plan text has been revised. |
| 188 | Patrick Costello | Add in "Napa County Flood Control and Water Conservation District" | Plan text has been revised. |
| 189 | Napa Valley Transportation Authority | See comment on ALL-5.3 re: Emergency Traffic Operations Center, and consider adding NVTA as partner to this Measure. | Thank you for your comment. |
| 190 | Napa RCD | As individual GHG reduction measures and adaptation measures move towards implementation, it will be important to build in time to consider how a single action/measure could incur multiple benefits and design implementation plans to maximize these co-benefits. For example, the actions under WW-3 ('Reduce Residential Water Use') and WW-4 ('Prioritize Native Drought Tolerant Plans in Municipal Landscaping') also have a nexus with AG-5 ('Expand the Urban Forest') and Measure Fire-3 ('Apply Wildfire Mitigation Best Practices Countywide'). Taking these areas of synergy into account will result in more robust and impactful implementation.<br>Consider incorporating the scientific literature on behavior change and adoption of climate friendly behaviors into the development of the implementation plan. Understanding barriers to adoption and the psychological factors that impact behavior change will be critical for ensuring maximum impact.<br>With more time I could check in with colleagues to find better resources. From a quick search of the latest literature and those translating this research into practice, here are a couple of examples:<br>Energy & Climate - See Change Institute<br>The Psychology of Climate Change Adaptation<br>Driving Urban Forestry Innovation - The Decision Lab | Thank you for your comment. See Chapter 6: Implementation and Monitoring. |
| 191 | Jeffrey Farmer | Very awkward to find a specific appendix since there are just two groups to select. I would like to bookmark it too so I can find it quickly without having to scroll through the whole thing. | Thank you for your comment. |

| 4. Comments recieved via email | | | |
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| **Comment Number** | **Name** | **Comment** | **Response** |
| E1 | David Graves | 1) the most significant GHG emission from wastewater treatment is nitrous oxide, not methane. Also, see Andrew Damron's comment letter on the Ascent analysis.<br>2) given the imminent closure of the Clover Flat landfill, it would be useful to include an analysis of the impact of capping the closed facility and using the landfill gases as a source of energy for electricity. And the analysis of ""waste in place" for the closed American Canyon Sanitary Landfill makes little sense, given the interval since its closure; its Land Fill Gas capture system flares the residual gas emissions.<br>3) there seems to be some cognitive dissonance in promoting business Jet operations at the Napa County Airport. Emissions from business jets are the most intensive source of emissions from any sector of civil aviation. And those emissions are not necessary—and no visible offsets exist. | Thank you for your comment. Please see Response #10 (air travel emissions), #17 (solid waste), #18 (wastewater) (low-carbon materials), & #25 (solid waste). |
| E2 | Jeaneatte Lynn McFall | Hello Jesse, I am a Sonoma county realtor and I am concerned about the elimination of gas as a power source relying only on electricity could trickle over to Sonoma county. The intended consequence here would be an electrical shortage resulting in mass power outages . Currently when the electricity goes out with gas water heaters and gas stoves available we can still heat our food and have hot water. If the only power source is electricity and the electric grid is overtaxed it would create outages,as a result as intended there would be no hot water and no way to heat the food additionally, also known by those proposing this would mean gas stations closed down as they require electricity to operate stranding people.. Vital electrical needs in the home would be ended, this could be life threatening.. People would suffer without a doubt if this intended halt of power sources is implemented. a junior high student with a low IQ would get this so it goes without saying that the people proposing this are aware of the dire consequences and are moving ahead anyway. There are remedies to intended dire consequences done to citizens by the ill intentions of the government we employ. . Get ready to find out what they are. Creating a city where the citizens suffer with no power will not help with the weather and the folks suggesting the change know it. As a matter of fact ,in case those proposing this have been buried in a bunker they would not help but notice that the local weather and weather in general around the planet has actually been better this year. If we are to be expected to change our energy source on a fabricated problem with the weather then realize that we should be given credit for the good weather with our current energy usage, It swings both ways> Blamed us for the bad weather due to our gas power source then you must then give us credit for the good weather due to our use of gas,back off leave us alone POWER ON!!! Thank-you, Jeanette Lynn McFall Re/Max Gold Santa Rosa. | Thank you for your comments. Please see Response #1 (building electrification) & #2 (energy audits). |

| Comment Number | Name | Comment | Response |
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| E3 | Andy Ryan | Dear RCAAP Committee, Dear RCAAP Committee,<br>I am a Napa County property owner writing to respectfully oppose the draft Regional Climate Action and Adaptation Plan (RCAAP) in its current form. While I strongly support Napa's commitment to sustainability and responsible climate action, this proposal introduces costly and unrealistic mandates that could have serious consequences for housing affordability, economic stability, and the well-being of our community.<br><br>Key Concerns:<br>Mandatory Home Retrofits (BE-1):<br>The plan may require the electrification of all existing homes replacing gas appliances, rewiring panels, and in some cases modifying driveways or roads to support infrastructure upgrades. These proposed changes come at significant cost, often ranging from tens to hundreds of thousands of dollars per property. In a region already struggling with high housing costs, this places an unsustainable burden on working families, seniors, and homeowners with fixed incomes.<br>Point-of-Sale Mandates (BE-2):<br>Requiring costly inspections, disclosures, and retrofits during real estate transactions could derail sales and possibly reduce property values, further restricting the housing market and discouraging investment in Napa Valley.<br>California's Grid Readiness:<br>The reality is that California's electrical infrastructure is not yet equipped to support widespread residential electrification. Has Napa leadership adequately studied this and will they present finding to the public? Blackouts, grid failures during heatwaves, and ongoing reliability concerns raise serious questions about the feasibility and safety of mandating full electrification at this time. Without major State and PG&E investment in transmission capacity, grid resilience, and energy storage, such mandates could set homeowners up for energy insecurity especially during peak demand seasons.<br>Infrastructure and Workforce Gaps:<br>Napa County currently lacks the electrical capacity, skilled contractor workforce, streamlined permitting systems, and accessible funding necessary to implement these abrupt changes. Is the County prepared to execute this plan? Please provide more information and your plan to address these concerns.<br>Disproportionate Burden on Homeowners:<br>Residential buildings contribute a smaller share of emissions compared to other sectors such as transportation, solid waste, wastewater, and public infrastructure. Why do the harshest mandates fall on individual homeowners? How do you think owners of physically obsolescent homes will pay for this mandate? This group of community member may be financially incapable of meeting these demands.<br>One-Size-Fits-All Approach:<br>Applying blanket electrification requirements to older homes likely built decades before modern energy code ignores the real challenges and costs that vary widely from one property to another.<br><br>Opportunities for a More Balanced Approach: | Thank you for your comments. Please see Response #1 (building electrification), #2 (energy audits), & #6 (implementation flexibility). |

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| | | Incentivize, Don't Mandate:<br>Provide voluntary programs; ie rebates for homeowners to make energy improvements at their own pace, without the proposed penalty or forced retrofits.<br>Lead by Example:<br>Modify  test your proposed program to begin with government-owned buildings, facilities, and vehicle fleets, which account for a significant share of emissions and can be upgraded efficiently and visibly.<br>Begin with New Construction:<br>California already has some of the most rigorous energy efficiency standards for new buildings. This is an example of an opportunity to create long-term emissions reduction without penalizing existing homeowners.<br>Provide Practical Guidance:<br>Develop a clear and accessible menu of energy efficiency options, so homeowners can select improvements that align with their homes, budgets, and timelines.<br>How will you seek expert advice/ consultation to create a set of viable solutions for homeowners?<br><br>Napa residents care deeply about the environment and want to be part of the solution. Meaningful climate action must be realistic, reasonably equitable, and informed by the current limitations of our infrastructure. The RCAAP, in its current form, risks creating deep inequities and further worsening our region's affordability crisis.<br>I respectfully urge Napa County leadership to revise this plan with a more measured, achievable path forward for your constituents. Please consider a plan that strengthens climate resilience without sacrificing affordability, fairness, or feasibility.<br>Thank you for your leadership and for considering these concerns.<br>Sincerely,<br>Andrew Ryan<br>Napa County Home Owner and Local Business Owner | |

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| E4 | Hillary Ryan | Dear RCAAP Committee,<br>I am a Napa County property owner. I am writing to respectfully oppose the draft Regional Climate Action and Adaptation Plan (RCAAP) in its current form. While I support Napa's commitment to sustainability and responsible climate action, this proposal creates unreasonable and costly mandates that would have major consequences for housing affordability, economic stability, and the well-being of our community.<br>Key Concerns:<br>Mandatory home retrofits (BE-1): The plan requires converting all existing homes to electric systems, replacing appliances, rewiring panels, and in some cases changing private driveways or roads. I understand that costs could range from tens of thousands to hundreds of thousands per property, This is an unrealistic and unfair burden on families when housing is already expensive.<br>Point-of-sale mandates for non-residential properties (BE-2): Requiring disclosures, inspections, and retrofits at the time of sale could derail transactions, and may reduce property values.<br>Affordability crisis: Housing in Napa is already among the least affordable in California. Adding these retrofitting costs risks pushing more families out of homeownership and raising rents for tenants.<br>Capacity gaps: Does Napa County currently have the electrical infrastructure, contractor base, permitting capacity, or funding mechanisms to realistically implement these mandates? Is the draft plan realistic?<br>Unfair targeting: Homes represent only a fraction of emissions compared to transportation, solid waste, wastewater, and public facilities. Yet, the harshest requirements are placed on homeowners.<br>One-size-fits-all approach: Older homes, built long before modern codes, cannot absorb a blanket mandate without significant hardship.<br><br>Potential Revision Opportunities:<br>Incentivize, don't mandate. Give homeowners options and financial support to make improvements rather than forcing compliance.<br>Lead by example. Government facilities, fleets, and operations should undergo electrification and efficiency upgrades first — as they represent a larger share of emissions than private homes.<br>Focus on new construction. State law already requires higher efficiency standards for new buildings. This is where long-term impact can be achieved without penalizing existing homeowners.<br>Practical solutions. Leadership can create a summary of energy efficiency options so property owners can choose the most cost-effective improvements that fit their homes and budgets.<br>Napa residents value the environment and want to be part of meaningful climate solutions. However, those solutions must be practical, affordable, and fair. The current RCAAP puts the heaviest burden on existing homeowners, who are already facing high costs of living.<br><br>I urge you to oppose the draft plan and instead advocate for a revised plan that balances environmental goals with housing affordability and community well-being.<br>Thank you for your leadership and for considering these concerns.<br>Sincerely, | Thank you for your comments. Please see Response #1 (building electrification), #2 (energy audits), & #6 (implementation flexibility). |

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| E5 | Stefani Phipps | Dear RCAAP Committee,<br><br>I am a Napa County property owner writing to express alarm and oppose the draft Regional Climate Action and Adaptation Plan (RCAAP) in its current form. While I strongly support Napa's commitment to sustainability and responsible climate action, this proposal introduces costly and unrealistic mandates that could have serious consequences for housing affordability, economic stability, and the well-being of our community.<br><br>Key Concerns:<br>Mandatory Home Retrofits (BE-1):<br>The plan may require the electrification of all existing homes replacing gas appliances, rewiring panels, and in some cases modifying driveways or roads to support infrastructure upgrades. These proposed changes come at significant cost, often ranging from tens to hundreds of thousands of dollars per property. In a region already struggling with high housing costs, this places an unsustainable burden on working families, seniors, and homeowners with fixed incomes. If this were to be mandated I would move as I cannot afford it.<br>Point-of-Sale Mandates (BE-2):<br>Requiring costly inspections, disclosures, and retrofits during real estate transactions could derail sales and possibly reduce property values, further restricting the housing market and discouraging investment in Napa Valley.<br>California's Grid Readiness:<br>The reality is that California's electrical infrastructure is not yet equipped to support widespread residential electrification. Has Napa leadership adequately studied this and will they present findings to the public? Blackouts, grid failures during heatwaves, and ongoing reliability concerns raise serious questions about the feasibility and safety of mandating full electrification at this time. Without major State and PG&E investment in transmission capacity, grid resilience, and energy storage, such mandates could set homeowners up for energy insecurity especially during peak demand seasons.<br>Infrastructure and Workforce Gaps:<br>Napa County currently lacks the electrical capacity, skilled contractor workforce, streamlined permitting systems, and accessible funding necessary to implement these abrupt changes. Is the County prepared to execute this plan? Please provide more information about your plan to address these concerns.<br>Disproportionate Burden on Homeowners:<br>Residential buildings contribute a smaller share of emissions compared to other sectors such as transportation, solid waste, wastewater, and public infrastructure. Why do the harshest mandates fall on individual homeowners? How do you think owners of physically obsolescent homes will pay for this mandate? Do you know how many are financially incapable of meeting these demands?<br>One-Size-Fits-All Approach:<br>Applying blanket electrification requirements to older homes likely built decades before modern energy code ignores the real challenges and costs that vary widely from one property to another. | Thank you for your comments. Please see Response #1 (building electrification), #2 (energy audits), & #6 (implementation flexibility). |

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| | | Opportunities for a More Balanced Approach:<br>Incentivize, Don't Mandate:<br>Provide voluntary programs; i.e. rebates for homeowners to make energy improvements at their own pace, without the proposed penalty or forced retrofits.<br>Lead by Example:<br>Test your proposed program to begin with government-owned buildings, facilities, and vehicle fleets, which account for a significant share of emissions and can be upgraded efficiently and visibly.<br>Begin with New Construction:<br>California already has some of the most rigorous energy efficiency standards for new buildings. This is an example of an opportunity to create long-term emissions reduction without penalizing existing homeowners.<br>Provide Practical Guidance:<br>Develop a clear and accessible menu of energy efficiency options, so homeowners can select improvements that align with their homes, budgets, and timelines.<br>How will you seek expert advice/ consultation to create a set of viable solutions for homeowners?<br><br>Napa residents care deeply about the environment and want to be part of the solution. Meaningful climate action must be realistic, reasonably equitable, and informed by the current limitations of our infrastructure. The RCAAP, in its current form, risks creating deep inequities and further worsening our region's affordability crisis.<br><br>It is precisely this kind of legislation pushing our country towards conservative, libertarian ideology. The costly nanny state has driven common citizens over the edge. I respectfully urge Napa County leadership to revise this plan with a more measured, achievable path forward for your constituents. Please consider a plan that strengthens climate resilience without sacrificing affordability, fairness, or feasibility.<br><br>Thank you for your leadership and for considering these concerns.<br>Stefani Phipps | |

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| E6 | Jolene A Yee | Dear Members of the Napa County Climate Action Committee:<br><br>Thank you for the opportunity to comment on the draft Napa County Regional Climate Action and Adaptation Plan (the "Plan"). It's clear that the draft is a culmination of years of effort and dedication to improving the lives of Napa County residents through environmental stewardship.<br>Delicato Family Wines is a fourth-generation family-owned and operated winery, which has been farming vineyards in California for over a hundred years. We are successful today in large part due to our dedication to environmental sustainability, a core value that informs every key decision we take across our business. We take seriously our responsibility to minimize the impacts of our business on the land, air, and water to ensure our community thrives for generations to come.<br>In line with many of the initiatives outlined in the Plan, Delicato has worked hard to implement sustainable practices across all our wineries and vineyards, including water and energy conservation, soil restoration, responsible packaging, recycling, and erosion control. All of our wineries and vineyards, including Black Stallion Estate Winery and Vineyards here in Napa, are Certified California Sustainable by the California Sustainable Winegrowing Alliance. This certification program ensures that we undergo an annual third-party audit of our sustainability efforts, and set annual action plans to reaffirm our dedication to continuous improvement. For Black Stallion, those actions include the use of solar panels to power the majority of the winery's energy since 2017; converting to an electric tractor to promote cleaner, quieter vineyard farming; establishing an estate garden, insectary and bee hives to preserve pollinator habitat; soil monitoring equipment that increases our precision of water use, and allows for greater resource conservation; and electric vehicle charging stations for our tasting room guests.<br>It is with our 100 years of experience and our dedication to sustainability and environmental stewardship that we raise significant concerns with Napa County and the cities of Napa County adopting the current draft Plan.<br>The Napa Valley wine industry, which represents not only a cornerstone of the local economy but also the cultural identity and livelihood of thousands of families, would be severely and negatively impacted by adoption of the Plan as currently drafted.<br>Our community is no stranger to the realities of climate change; families live with the daily consequences—wildfire, drought, floods, extreme heat—and we support efforts to address these urgent challenges. At the same time, we are facing headwinds like never before: escalating costs of production, workforce shortages, global competition, tariffs, and growing regulatory burdens. For many families, the survival of multigenerational businesses is at stake.<br>The crux of our concern is not about whether Napa County should act on climate—it must. The issue is how. Adoption of the RCAAP in its current form, without greater clarity on implementation, funding sources, timelines, and cost-sharing, is irresponsible and risks creating serious unintended consequences.<br><br>The plan outlines 46 greenhouse gas reduction measures and 40 adaptation measures, but provides little detail on how these measures will be applied specifically to agriculture and wine production—the very backbone of our local economy and community identity.<br>The funding strategy is vague, with a heavy reliance on potential partnerships and mechanisms that have not yet been fully researched or confirmed, leaving businesses uncertain about whether they will be asked to shoulder costs they cannot bear.<br>Families who have stewarded Napa's agricultural lands for generations are already under severe pressure; a plan of this magnitude must be realistic, transparent, and equitable in its demands.<br><br>We urge the County and participating jurisdictions to pause before final adoption and engage in deeper dialogue with those most directly impacted; the Plan should prioritize the initiatives and determine what is a concrete goal vs a target or aspirational benchmark. Those initiatives should have concrete costs associated with each, and a reasonable plan to pay for them without bankrupting businesses and families. More detail is needed to ensure this plan is both environmentally effective and economically sustainable.<br>Napa Valley can and should be a leader in climate resilience. But leadership requires a plan that is grounded in partnership, clarity, and fairness. The current draft does not yet meet that test.<br><br>Thank you again for the opportunity to comment. Kind Regards, | Thank you for your comments. Please see Responses #4 (implementation) & #5 (costs & funding) |

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| E7 | Jeff Farmer | Hello, Idling vehicles are a big source of pollution especially nitrous oxide. According to the EPA idling vehicles emit 20 times more pollution than vehicles going 30mph. Yet there is no discussion in the report on this.<br>Anyone who has driven down Hwy 29 in the early morning or late afternoon has seen hundreds of cars idling at the signal light at Madison in Yountville. Another big idling area is the Hwy 12/ Hwy 29 intersection at the airport. There are probably more.<br>But Item TR-12, pg 61 of the report has transportation improvements as not available. Spending money to improve our transportation system to reduce idling is a potential area of improvement and has the benefit of not forcing drivers to do anything differently. Roundabouts are one obvious solution. Another innovation is the "turn on yellow if safe" lights along Jefferson Street in Napa between Third Street and Clay. This can mean less idling for cars waiting to make left turns. Every little bit helps. We do have roundabouts at First Street/Hwy29 and Hw12/Hwy221 and they have been very effective to keep traffic moving. I wonder if pre and post pollution measurements were done to see how much they decreased pollution.<br>At the last St. Helena ATSC meeting on September 3rd we had a robust discussion of this draft report. However, the opinions I express above are personal and not those of the ATSC committee.<br><br>Jeff Farmer<br>Chair, ATSC<br>St. Helena | Thank you for your comment. Please see Response #21 (transportation improvements). This measure has been removed for reasons unrelated to this comment. This was also submitted as a comment on the Konveio platform. |
| E8 | Jonna Beck Lewis | Dear committee members,<br>I urge you to STOP the push for mandatory home retrofits!! This plan is absolutely unreasonable and unaffordable to most of us that are just trying to keep our heads above water. A point of sale requirement will only make housing more unaffordable. Further, the available housing inventory will shrink as these costs will eat up what ever small equity a homeowner may have making selling pointless in many cases.<br>Incentives, NOT mandates !!<br>Jonna Lewis<br>Napa resident | Thank you for your comments. Please see Response #1 (building electrification), #2 (energy audits), #6 (implementation flexibility), & #7 (equity & affordability). |
| E9 | Jacqueline Rowell | Dear Napa Climate Action Committee,<br>I am writing to express my concerns regarding the proposed Residential Climate Action Acceleration Plan (RCAAP). While I appreciate the Committee's commitment to reducing emissions, I do not support the current proposal for the following reasons:<br>Affordability: Housing in Napa is already out of reach for many families. Mandating upgrades to existing homes risks displacing residents and further increasing the cost of homeownership, making housing less accessible.<br>Capacity Gaps: The necessary infrastructure, electricity supply, skilled contractors, permitting processes, and funding to support this mandate are uncertain. The plan moves faster than what current resources and systems can realistically accommodate.<br>Unfair Targeting: Homes account for only a fraction of Napa's total emissions. Transportation, solid waste, wastewater, and public facilities contribute the majority, yet the plan places the heaviest burdens on individual homeowners.<br>One-Size-Fits-All Approach: Most homes were built before modern energy codes. A blanket mandate may be unworkable or financially unfeasible for many properties, and could disproportionately impact lower- and middle-income families.<br>I urge the Committee to consider more balanced and feasible approaches that address emissions across all sectors without overburdening homeowners.<br>Thank you for your time and consideration.<br>Sincerely,<br>Jacqueline Rowell<br>Broker/Owner of Local Living | Thank you for your comments. Please see Response #1 (building electrification) & #2 (energy audits). |

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| E10 | Christopher Warner | Please include the attached comments on the draft Regional Climate Action and Adaptation Plan in the public record of comments on the draft Plan. Please also include these comments on the draft Plan as public comments on Agenda Item 5.A in the public agenda materials for the Climate Action Committee September 26, 2025 meeting.<br>In addition, please include in the public agenda for Item 5.A at the September 26, 2025 Climate Action Committee meeting the discussion and comments on the draft RCAAP at the St. Helena City Council meeting on September 23, 2025 at the following link, 54:30 to 1:16.39. https://youtu.be/zzDdnIcNEp0<br>These comments are my personal comments only, not in any official capacity and not representing any third party or entity.<br>Thank you!<br>Christopher J. Warner | See E11 & E12 below for attachments |
| E11 | Christopher Warner | Attachment: Summary of Recommendations (see document archive on Napa County RCAAP web page) | |
| E12 | Christopher Warner | Attachment: Preliminary Comments on Draft Napa Regional Climate Action and Adaptation Plan (see document archive on Napa County RCAAP web page) | Full list of comments disaggregated below |
| E12.1 | Christopher Warner | The Draft RCAAP's voluntary measures and programs are worthy of consideration and potential funding by the Climate Action Committee, participating jurisdictions and the public. However, the mandatory greenhouse gas reduction and climate adaptation measures recommended by the Draft RCAAP are not supported by environmental analysis, quantitative benefit-cost evaluation, impacts on vulnerable and disadvantaged communities, or feasible funding to pay for the government costs of implementation. These proposed mandatory measures and programs should not be considered or adopted until the missing analyses, evaluations and assured sources of funding are completed and available for review and public consideration. | Please see Response #4 (implementation), #5 (costs & funding), #6 (implementation flexibility), & #7 (equity & affordability). |
| E12.2 | Christopher Warner | the Draft RCAAP fails to include essential information and benefit-cost analyses on its proposed mandatory measures. These analyses are essential for consideration by the Napa Climate Action Committee, elected leaders, communities, and members of the public. The Draft RCAAP is not ready for consideration or adoption until this missing information and analysis is included and the Draft RCAAP complies with environmental and other legal requirements. | Please see Response #5 (costs & funding). |
| E12.3 | Christopher Warner | The Draft Plan must be modified to answer the following three basic questions, before it can be considered by the public and participating jurisdictions: | Please see Response #5 (costs & funding). |
| E12.4 | Christopher Warner | How much will it cost Napa residents, businesses, schools, hospitals and local governments to comply with the Draft Plan? | Please see Response #5 (costs & funding). |
| E12.5 | Christopher Warner | Where will Napa local governments get the $1.1 billion in funding required just to implement and enforce the Draft Plan? | Please see Response #4 (implementation) & #5 (costs & funding). |
| E12.6 | Christopher Warner | How will the Draft Plan impact workers and other vulnerable and disadvantaged community members in Napa, including impacts on affordable housing, living and commuting expenses, jobs and small businesses? | Please see Response #7 (equity & affordability). |
| E12.7 | Christopher Warner | 1. Lack of Required Environmental and Legal Reviews.<br>The Draft RCAAP has not completed required environmental review. The Climate Action Committee staff has recommended seeking to avoid full environmental review, contrary to the Committee consultant's recommendations on CEQA.3 Even if limited, the initial environmental review will not be available for 6- 9 months, and a full environmental review including a program environmental impact report will take more than a year. | Please see Response #34 (environmental review). |
| E12.8 | Christopher Warner | Additionally, municipal and state regulations that prohibit the<br>distribution of natural gas to existing building and property owners have been declared unlawful by the Ninth Circuit, United States Court of Appeal.4 The Draft RCAAP's proposal to ban the use of natural gas by mandating that existing residential and non-residential buildings be retrofitted to eliminate the use of gas and gas appliances will not only be significantly costly to the public, but also may be unlawful and barred by the federal courts. | Please see Response #1 (building electrification) & #2 (energy audits). |
| E12.9 | Christopher Warner | RECOMMENDATION: Public comments and final adoption of the Draft Plan by participating jurisdictions should not be scheduled until the required environmental and legal reviews and modifications to the Draft RCAAP in response to the environmental and legal reviews are completed and available to the public. | Please see Response #34 (environmental review). |
| E12.10 | Christopher Warner | 2. Lack of Funding for Local Government Costs of Implementing the Draft RCAAP.<br>The Draft RCAAP includes no assured funding to cover the $1.1 billion-<br>$1.4 billion estimated government implementation costs required by the Draft RCAAP's measures and programs.5 Unless funding for government implementation costs is assured, it is not feasible for affected Napa governments to evaluate the cost-effectiveness and fiscal feasibility of the proposed measures and programs in the Draft RCAAP. | Please see Response #4 (implementation) & #5 (costs & funding). |

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| E12.11 | Christopher Warner | RECOMMENDATION: The Draft RCAAP should not be considered and adopted until realistic sources of funding and budgets for the governmental costs of implementing the plan are identified and assured, particularly in light of severe current reductions in available state and federal funding. | Please see Response #4 (implementation) & #5 (costs & funding). |
| E12.12 | Christopher Warner | 3. Lack of Modifications and Consistency Reviews of Jurisdictions' General Plans, Housing Elements, Hazard Mitigation Plans, Local Climate Plans, Zoning Codes, Building Codes, Etc.<br>The Draft RCAAP's procedural schedule includes no schedule for the required modifications to the participating jurisdictions' General Plans,Housing Elements, Hazard Mitigation Plans, local climate plans, zoning and building codes, and potential CEQA mitigation measures. These modifications and reviews must be considered and completed prior to approving and implementing the recommended mandatory individual greenhouse gas reduction and climate adaptation measures in the Draft RCAAP. | Please see Response #4 (implementation), #5 (costs & funding), &6. |
| E12.13 | Christopher Warner | RECOMMENDATION: The procedural schedule should be modified to<br>require consideration and completion of required changes to General Plans, Housing Elements, Hazard Mitigation Plans, zoning and building codes and local climate plans prior to adoption and implementation of the Draft RCAAP. | Please see Response #4 (implementation) & #5 (costs & funding). |
| E12.14 | Christopher Warner | 4. Lack of Clarity Regarding Whether the Draft RCAAP's Measures and Programs Are Voluntary or Mandatory When Adopted by the Local Governments, or Will Be Enforced by an Independent "Joint Powers Authority". | Please see Response #4 (implementation), #5 (costs & funding), & #6 (implementation flexibility). |
| E12.15 | Christopher Warner | The Draft RCAAP as written provides for adoption of numerous legally binding greenhouse gas reduction measures and unbudgeted programs that each Napa local government would be required to enforce against residents, businesses, agricultural entities, housing developers, retailers, workers, visitors and the local governments themselves. | Please see Response #4 (implementation) & #5 (costs & funding). |
| E12.16 | Christopher Warner | The Draft RCAAP also as written appears to be intended to be adopted as a single "regional climate plan" with no separate modifications or changes by individual Napa jurisdictions, but including a yet undetermined sharing and allocation among the individual participating jurisdictions of the $1.1 billion in government implementation costs and yet undetermined costs of compliance to the public, residents and businesses in each of the jurisdictions. | Please see Response #4 (implementation) & #5 (costs & funding). |
| E12.17 | Christopher Warner | Contrary to these provisions of the Draft RCAAP as written, initial comments by elected leaders of the various local governments during presentations by Committee staff appeared to be confused as to whether the individual measures and programs in the Draft RCAAP are intended to be voluntary, or whether the plan is intended to be adopted by each jurisdiction "up or down" without separate changes. | Please see Response #4 (implementation) & #5 (costs & funding). |
| E12.18 | Christopher Warner | Additionally, Committee staff are considering whether enforcement of the Draft RCAAP should be delegated to a new "joint powers authority" instead of to each individual Napa jurisdiction. | Please see Response #4 (implementation) & #5 (costs & funding). |
| E12.19 | Christopher Warner | RECOMMENDATION: This confusion as to whether the Draft RCAAP is intended to require new, mandatory measures unanimously agreed to by all participating jurisdictions or enforceable by an independent new "joint powers authority" should be resolved before any further public, stakeholder or local government consideration of the Draft RCAAP. | Please see Response #4 (implementation), #5 (costs & funding), & #6 (implementation flexibility). |
| E12.20 | Christopher Warner | Comments on Substantive Omissions in the Draft RCAAP | N/A |
| E12.21 | Christopher Warner | 1. Lack of Benefit-Cost and Equity Evaluations for Each of the Mandatory Greenhouse Gas Reduction and Climate Adaptation Measures, and Lack of Cost Estimates for the Compliance Costs of Each.<br>Contrary to California and federal standards on new government regulations and projects, the Draft RCAAP has no benefit-cost evaluations or cost effectiveness evaluations for each of its 47 targeted and mandatory greenhouse gas reduction measures and programs that Napa governments including St. Helena would be required to adopt and begin implementing in 2026. 30 of the greenhouse gas reduction measures have no quantification of greenhouse gas reductions at all. | Please see Response #5 (costs & funding) and RCAAP Chapter 3, Section 3.2 Overview of Greenhouse Gas Reduction Measure Analysis for more information on why some of the GHG reduction measures are not quantified. |
| E12.22 | Christopher Warner | RECOMMENDATION: The Draft RCAAP should include benefit-cost evaluations for each proposed measure and program, consistent with benefit- cost methods for government programs and regulations, before the Draft RCAAP is submitted to the Napa jurisdictions and the public for consideration. | Please see Response #5 (costs & funding). |
| E12.23 | Christopher Warner | The Draft RCAAP has no "affordability" analysis, and no "equity" evaluation of the impact of the Draft RCAAP on low-income, disadvantaged and vulnerable communities, particularly regarding availability of affordable housing and convenient transportation. | Please see Response #7 (equity & affordability). |
| E12.24 | Christopher Warner | RECOMMENDATION: The equity and affordability analysis of the Draft RCAAP should be developed and included prior to any consideration of the Draft RCAAP by participating jurisdictions and the public. | Please see Response #7 (equity & affordability). |

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| E12.25 | Christopher Warner | The “cost estimates” provided in the Draft RCAAP only cover government implementation costs, not the costs to the general public, households, residents, workers or businesses to comply with the Draft RCAAP. Even as so limited, the Draft RCAAP estimates that the costs to Napa governments to implement the Draft RCAAP for 19 of the proposed greenhouse gas reduction measures and “climate adaptation” measures would be from $1.1 billion to as much as $1.4 billion. Divided up by the population of each of the participating Napa jurisdictions, St. Helena’s governmental costs of implementation alone could be 4% or $44-$56 million or higher. | Please see Response #5 (costs & funding). |
| E12.26 | Christopher Warner | The Draft RCAAP provides no estimates of the costs of compliance by residents, homeowners, wineries, hotels, retailers, and other members of the public and businesses et al. However, it is reasonable to expect that the compliance costs overall could be as much as an order of magnitude higher than $1.1- 1.4 billion estimates of governmental implementation costs. | Please see Response #5 (costs & funding). |
| E12.27 | Christopher Warner | RECOMMENDATION: The Draft RCAAP should not be considered by the participating jurisdictions and the public until the estimated costs to the public and all affected stakeholders are included in the Draft RCAAP. | Please see Response #5 (costs & funding). |
| E12.28 | Christopher Warner | Existing Building Electrification Mandate. The most costly greenhouse gas reduction measure recommended by the Draft RCAAP is to mandate that all 56,000 residential homes and buildings and all 35,000 non-residential restaurants, retail stores, wineries and other buildings be “retrofit” to be “zero-carbon” and “electrified,” which means prohibiting use of gas appliances and converting all the buildings to electricity. | Please see Response #1 (building electrification) & #2 (energy audits). |
| E12.29 | Christopher Warner | Non-residential buildings including schools, hospitals, stores, restaurants, hotels, offices, wineries and public buildings would need to begin to be retrofitted, converted to electrification and stop using natural gas beginning as early as 2026. Residential buildings and homes would need to be retrofitted and stop using natural gas beginning in 2031 (only because the California Legislature has prohibited adoption of stricter local building codes before 2031, in order to make housing more affordable.) Even if the effective date for the residential building mandatory retrofits were delayed until 2031, adoption of the building electrification standards beginning in 2026 would likely have an immediate, significant impact on the market value of all residential real estate properties and residential real estate sales, as well as on appraisals for calculating property taxes and revenues. Potential buyers would adjust their purchase offers downward to reflect the $30,000 to $100,000 in retrofit costs that each property owner would incur to comply with the new building electrification standards beginning in 2031. | Please see Response #1 (building electrification) & #2 (energy audits). |
| E12.30 | Christopher Warner | The governmental cost of implementing and enforcing these new “building electrification” mandates is estimated to be $448 million.10 The cost of the actual retrofits and conversion to electrification would be from $30,000 to as much as $100,000 per residential home and building alone, based on PG&E cost estimates for building electrification and “de-carbonization,” as well as the recent per-unit costs for electrification of Laurel Manor multi-family housing in the City of Napa. | Please see Response #5 (costs & funding). |
| E12.31 | Christopher Warner | This means the total compliance and implementation costs for all 56,000 residential homes and buildings in the County could be over $2 billion (residential buildings alone; costs for non-residential buildings would likely be similar on a per unit basis.) | Please see Response #5 (costs & funding). |
| E12.32 | Christopher Warner | RECOMMENDATION: The Draft RCAAP’s proposed mandatory residential and non-residential building electrification mandate should not be adopted unless the quantitative benefits to Napa residents and businesses significantly exceed the costs of compliance and the impacts on real estate market values and the appraisals that impact property tax revenues. | Please see Response #5 (costs & funding) & #6 (implementation flexibility). |
| E12.33 | Christopher Warner | New Building Electrification Mandate. New housing and buildings— including affordable housing, rental housing, retail stores, restaurants, government buildings, schools, hospitals, hotels, office buildings, wineries, etc.—would be required to be fully “zero carbon” and not use natural gas beginning in 2026, resulting in immediate, significant additional costs for new and affordable housing in Napa.12 The Draft RCAAP provides no estimates for the additional costs or the impact of this new government mandate on affordable and new housing. | Please see Response #5 (costs & funding). |
| E12.34 | Christopher Warner | RECOMMENDATION: Similar to the existing building electrification mandate, the Draft RCAAP’s proposed new building electrification mandate should not be adopted unless the direct benefits and costs to new housing and buildings are evaluated and the benefits significantly exceed the costs to new and affordable housing, economic development and the local Napa economy. | Please see Response #5 (costs & funding). |

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| E12.35 | Christopher Warner | Other costly measures recommended by the Draft RCAAP include:<br>a. Green Certification of All Wineries. Require all new wineries, winery retrofits, and additions greater than 10 percent to complywith “sustainability certification” standards, targeting 75 percent of all existing vineyard acreage to be certified by 2030.13 No cost estimates are provided.<br>b. Restrict fossil fuel use by agricultural field equipment and irrigation pumps, replace with renewable electricity only.14 No cost estimates are provided.<br>c. Implement “transportation demand management” ordinances and measures to reduce “vehicle miles traveled” by residents, workers and visitors, and reduce existing public and off-street parking in existing and new housing and building developments.15 No cost estimates are provided.<br>d. Require and mandate reusable food ware and waste reduction, and commercial food waste diversion.16 No cost estimates are provided.<br>e. Restore and re-forest 20% of all areas affected by wildfire since 2017.17 No cost estimates are provided.<br>f. Require all existing and new residential and commercial structures to implement “home hardening” to protect against wildfires.18 No costs estimates are provided.<br>g. Reduce indoor residential water use and impose new water conservation standards and tiered water rates, including prohibition on “wasteful” water uses such as use of potable water for irrigation, even during non-drought conditions.19 No cost estimates are provided.<br>h. Multiple mandatory measures requiring municipal infrastructure, equipment and vehicles to be retrofitted orreplaced to achieve greenhouse gas reduction and climate adaptation standards.20 No cost estimates are provided. | Please see Response #5 (costs & funding). |
| E12.36 | Christopher Warner | RECOMMENDATION: These additional measures and programs should not adopted until specific cost estimates and benefit-cost evaluations are completed. | Please see Response #5 (costs & funding). |
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| E13 | Rainer Hoenicke | Dear Meeting Clerk -<br>Would you please enter the comment below into the record?<br>Dear Climate Action Committee Members and Board of Supervisors,<br>I'd like to congratulate staff on beginning to implement a few immediate actions ("low-hanging fruit") since the passing of the Climate Emergency Resolutions by all land-use jurisdictions in the County. In the years that city and town jurisdictions have adopted their own Climate Emergency Resolutions several years ago, I am surprised how few immediate actions have been implemented since then, despite available examples throughout California and the nation. I'd like to enumerate a few examples:<br>1) Using Measures T and G for using innovative, highly heat reflective surfaces for re-paving streets and roads, according to best management practices (BMPs) enacted in numerous cities throughout the Southwest, which could easily be taken off the shelf by our local Public Works Departments to reduce heat island effects.<br>2) Re-designing arterial streets and roads to accommodate large trees to enhance turning the heat down in our densely populated spots. Examples of this include the lost opportunities for doing so before the resurfacing of Trower Avenue from Dry Creek Road to its current end at the sport facilities at the Vintage HS campus and at Jefferson Street from Trancas St. to Salvador Ave. where a planted median strip already partially exists, with potential of extending that strip from Yellowstone to Trower, and from there to Salvador.<br>3) It is my hope that the City Council directs the Department of Public Works to not repeat lost opportunities for the forthcoming resurfacing projects in the Lincoln and Imola corridors and apply generally acceptable BMPs there and for future upgrades, even in smaller residential streets with multiple additional benefits (e.g., pedestrian and bicycle safety), where possible.<br>Thank you,<br>Rainer Hoenicke | Thank you for your comments. These comments have been forwarded to the City of Napa. |

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| E14 | Susan V | To whom it concerns,<br>I ask with all I can muster that you vote against this plan that mandates resale homes to retrofit the list of items on the proposal. I beg for myself, who is facing retirement, my parents, all my clients and all the citizens, especially those who are retired on a fixed income.<br>These retrofits will cost these people, especially retirees, thousands of dollars. Recently I had my furnace go out and instead of a simple replacement costing $6000, to switch to electric the cost zoomed up to $33,000. Retiree's and most citizens cannot afford this & will have to sell their nest egg instead.<br>Already with fire hazard insurance going skyhigh, mine zoomed from $1500/year to my recent renewal of $10,800/year! We cannot afford these crazy extra costs.<br>Lastly, we live in America where we enjoy choice, not the government forcing us to live a certain way just because a few people believe this is the way everyone should live. I don't want to live like they do in China and other large governmental forced laws on everything.<br>Please vote against this. Instead: Give homeowners incentives and choices on how to improve their homes - not rigid mandates. | Thank you for your comments. Please see Response #1 (building electrification) #2 (energy audits), & #6 (implementation flexibility). |
| E15 | David Graves | Dear Chair Gallagher:<br>One should not view the Inventory as cast in stone. I believe the Waste-in-place and Wastewater Treatment values are incorrect, and that fact has implications in understanding of the consequences of the various reduction strategies.<br>David Graves | Thank you for your comment. Please see Response #17 (solid waste) & #18 (wastewater). |
| E16 | Jack Gray | To whom it may concern;<br>I am a long time napa resident. I am also a retired UC Berkeley and registered professional engineer. My studies and career have included graduate level studies and professional work in the electrical, nuclear and environmental fields. I am also a founding member, past president and director of the Napa County Taxpayers Association (FPCC # 1381702).<br>I believe all local RCAAP activities in NAPA county should be terminated.<br>Regards, Jack Gray | Thank you for your comment. |
| E17 | Christopher Warner | In addition, changes to other parts and supporting documents for the RCAAP, e.g. Appendices H and I, should be made consistent with these comments. Thank you!<br>At the Climate Action Committee Sept 26, 2025 meeting, Committee staff and members represented that the draft RCAAP's building electrification measures are intended to be voluntary, not mandatory. Consistent with that discussion, attached are recommended changes to the draft RCAAP's building electrification measures to ensure that they are voluntary, not mandatory.<br>Please include these changes in the next version of the draft RCAAP for consideration by the Committee and the public. In addition, because the Committee staff presentation on Agenda Item 5.A. was not available to the public prior to the Sept 26 meeting, please include these additional preliminary comments directly to all Committee members and in the after-meeting public and on-line record on Agenda Item 5. A.<br>Thank you for your consideration of these additional preliminary comments on the draft RCAAP.<br>Christopher J. Warner | Thank you for your comments. Plan text has been revised. See Response #1 (building electrification) & #6 (implementation flexibility). |
| E17a | Christopher Warner | Attachment: Recommended Changes to RCAAP BE (see document archive on Napa County RCAAP web page) | |
| E18 | Christopher Warner | Please include in the public record and comments on the Draft RCAAP the attached benefit-cost evaluation of the Draft RCAAP mandatory Building Electrification Measure BE-1.<br>The benefit-cost evaluation uses the Draft RCAAP's cost estimates and other reasonable cost estimates to calculate the benefit-cost evaluation of Measure BE-1 using the Social Cost of Carbon (SCC) used and approved by the federal government during the Obama and Biden Administrations.<br>Based on these cost and benefit estimates, including using the approved Social Cost of Carbon, the benefit-cost ratios are significantly less than 1.0, demonstrating that the Draft RCAAP Building Electrification Measure BE-1 is significantly and grossly cost-ineffective and should be deleted from the Draft RCAAP:<br>Thank you for your consideration of these additional preliminary comments. | Thank you for your comment. See Response #5 (costs & funding). |

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| E19 | Christopher Warner | The benefit-cost evaluation uses the Draft RCAAP's cost estimates and other reasonable cost estimates to calculate the benefit-cost evaluation of Measure BE-1 using the Social Cost of Carbon (SCC) used and approved by the federal government during the Obama and Biden Administrations.<br>Based on these cost and benefit estimates, including using the approved Social Cost of Carbon, the benefit-cost ratios are significantly less than 1.0, demonstrating that the Draft RCAAP Building Electrification Measure BE-1 is significantly and grossly cost-ineffective and should be deleted from the Draft RCAAP:<br>Benefit-cost calculation/ratio using Draft RCAAP cost estimates and Social Cost of Carbon:<br>$1,461,558- $6,611,810 /<br>$359,870,000 (net present value) – $448,380,000 (nominal) =<br>0.003 – 0.018<br>Benefit-cost calculation/ratio using alternative more likely cost estimates and Social Cost of Carbon:<br>$1,461,558 / $560 million - $1.68 billion = 0.003- 0.001<br>$6,611,810 / $560 million - $1.68 billion = 0.012 -0.004<br>Thank you for your consideration of these additional preliminary comments on the Draft RCAAP. | Thank you for your comment. See Response #5 (costs & funding). |
| E20 | David Graves | Comments on the Napa Cities/ County RCAAP<br>Thanks for the opprtunity to comment.<br>I believe the analysis of Solid Waste//Waste in Place shows a fundamental error in the amount of methane emitted, Measures already in place trap at least 75% of the landfill gas and burn the methane it contains. The fugitive methane is less than 500 MT or less, at a GWP value of 27.9, the emissions from ACSL do not exceed 13,950 MTCO2e, and the benefit/cost ratio to chase the last fraction of emissions is likely a poor investment. (I will not engage in the debate about what te proper value of methane's GWP should be; that is not to say it is not a worthwhile discussion.) This exagerration of the impact of waste-in-place emissions has serious consequences when the Plan looks at reducing emissions going forward, Inspection of the graphical representation,shows that as other sources of GHG emissions decrease, the share of the total emissions from "waste-in-place" especially at the American Canyon Sanitary Landfill.goes up. Both Sanitary Landfills in the County are subject to reporting requirements by the EPA under the FLIGHT program and by the CARB/SFBAAQMD Landfill Methane Regulation program. Retiring and closing Clover Fat to a higher standard (lower amount) of fugitive methane emissions might make sense, but investing an lot at American Canyon Sanitary Landfill does not.<br>The Plan errs in characterizing methane as the main greehouse gas emitted at NapaSan. It is in fact nitrous oxide, with GWP value of 300. Reducing NItrous Oxide will require closer process controls, especially for dissolved oxygen in various stepsalong the way. The wastewater treatment sector nationwide will continue to work diligently to reduce missions from wastewater treatment. I will forward NapaSsn's consultant's report on GHG emissions. A small thing but easily corrected, :the Plan overstates the number of trips to haul winery waste to EBMUD by as much as 50% according to survey data.<br>The Carbon Stock Analysis will benefit from more accuate acreage values for landscape vegetation types, and more accurate characterization from using information developed by CARB's project on Natural and Working Lands. The County's Baseline Date Report for the Geeral Plan is well-suited to cataloging and verifying plant communities areas and varying categories of land use.<br>The analysis of emissions due to buildings is made less useful by the choice to make the greenhouse gas emissions from PG&E's electricity portfolio zero for 2019. This is an accident of accounting and while it may be technically correct, this value is misleading and should be discarded for something more useful. I realize values calculated for compliance with the CPUC's Renewable Portfolio Standard are not exactly compatible to total GHG emissions, but those values are more useful than this accounting fiction. See CPUC, December 2024 Annual RPS Report to the Legisature) PG&E's RPS value is on the order of 31% for 2019, a long way from virtually 100% GHG-free.<br>As for the goal of eliminating GHG emissions from buildings, it is important to remember that building systems wear out and must be replaced. Accordingly, one example is the existing stock of natural gas water heaters (residential or commercial) that will need replacement sometime before the building is replaced. The question is whether we can devise an ecosystem or network that will make it as easy or easier to swap out a failed natural gas warerheater for an electric heat pump water heater.as buy a GHG-spewing replacement at the big box store. We must 1) win over contractors/vendors/gatekeepers, so that homeowners and property owners find it easy and 2) we need to create mechanisms to supplement the existing financial incentives that will bridge the up-front cost gap, especially for less-wealthy homeowners. (Financing from a revolving fund loan repaid from the utility bill is one model.) The effort required to get the first 15% of water heaters retrofitted is probably an order of magnitude greater than the effort required to get the last 15% done. There is a saying in marketing—"about the time you | Full list of comments disaggregated below |

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| | | get really sick of repeating it is about the time your audience begins to get it."<br>Water heaters wear out—but it takes a more concerted effort to enlist owners to retrofit buildings with leaky windows, upgrade insulation, reduce water use and install energy-efficient lighting. The return on those investments is not instantaneous, and again may require creative sources of financing. I think an untapped "made in Napa" offset program that visibly invests in emission-reducing measures right here in our community could play an important role in jump-startigbuidig retrofits<br>Green business standards need to embrace buiding decarbonixation, but also need to extend its standards into the carbon-intensive side of the wine business known as fulfillment, or shipping wine to customers. Medium-payload electric box trucks are available by any manufacturers. DC fast charging can met te needs of high capacity electric semi-trucks, if the charging network expands. As stationary batteries become less expensive, more opportunities exist for VPP/DER to take advantage of local self-generation. The American Canyon Sanitary Landfill is a brownfield site that can be repurposed to become the home of a significant solar array. The Green Island Road vineyard could host a large agrovoltaic site. Both sites are near grid connections.<br>For new construction, public works agencies and private contractors should give preferenc to innovative materials like low-carbon concrete, mass timber,, low- to-no-runoff site design, and rainwater capture etc. Stormwater capture to provide for managed aquifer recharge should be part of our response to more irregular rainfall.<br>These comments, while covering many topics, are not the last word on these topics.<br>David Graves | |
| E20.1 | David Graves | I believe the analysis of Solid Waste/Waste in Place shows a fundamental error in the amount of methane emitted, Measures already in place trap at least 75% of the landfill gas and burn the methane it contains. The fugitive methane is less than 500 MT or less, at a GWP value of 27.9, the emissions from ACSL do not exceed 13,950 MTCO2e, and the benefit/cost ratio to chase the last fraction of emissions is likely a poor investment. (I will not engage in the debate about what te proper value of methane's GWP should be; that is not to say it is not a worthwhile discussion.) This exaggeration of the impact of waste-in-place emissions has serious consequences when the Plan looks at reducing emissions going forward, Inspection of the graphical representation, shows that as other sources of GHG emissions decrease, the share of the total emissions from "waste-in-place" especially at the American Canyon Sanitary Landfill goes up. Both Sanitary Landfills in the County are subject to reporting requirements by the EPA under the FLIGHT program and by the CARB/SFBAAQMD Landfill Methane Regulation program. Retiring and closing Clover Fat to a higher standard (lower amount) of fugitive methane emissions might make sense, but investing a lot at American Canyon Sanitary Landfill does not. | Please see Response #17 (solid waste). |
| E20.2 | David Graves | The Plan errs in characterizing methane as the main greenhouse gas emitted at NapaSan. It is in fact nitrous oxide, with GWP value of 300. Reducing Nitrous Oxide will require closer process controls, especially for dissolved oxygen in various steps along the way. The wastewater treatment sector nationwide will continue to work diligently to reduce missions from wastewater treatment. I will forward NapaSan's consultant's report on GHG emissions. A small thing but easily corrected, :the Plan overstates the number of trips to haul winery waste to EBMUD by as much as 50% according to survey data | Please see Response #18 (wastewater) & 26. |
| E20.3 | David Graves | The Carbon Stock Analysis will benefit from more accurate acreage values for landscape vegetation types, and more accurate characterization from using information developed by CARB's project on Natural and Working Lands. The County's Baseline Date Report for the General Plan is well-suited to cataloging and verifying plant communities areas and varying categories of land use. | Please see Response #28 (working lands carbon stock). |
| E20.4 | David Graves | The analysis of emissions due to buildings is made less useful by the choice to make the greenhouse gas emissions from PG&E's electricity portfolio zero for 2019. This is an accident of accounting and while it may be technically correct, this value is misleading and should be discarded for something more useful. I realize values calculated for compliance with the CPUC's Renewable Portfolio Standard are not exactly compatible to total GHG emissions, but those values are more useful than this accounting fiction. See CPUC, December 2024 Annual RPS Report to the Legislature) PG&E's RPS value is on the order of 31% for 2019, a long way from virtually 100% GHG-free. | Please see Response #11 (PG&E emission factors). |

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| E20.5 | David Graves | As for the goal of eliminating GHG emissions from buildings, it is important to remember that building systems wear out and must be replaced. Accordingly, one example is the existing stock of natural gas water heaters (residential or commercial) that will need replacement sometime before the building is replaced. The question is whether we can devise an ecosystem or network that will make it as easy or easier to swap out a failed natural gas water heater for an electric heat pump water heater.as buy a GHG-spewing replacement at the big box store. We must 1) win over contractors/vendors/gatekeepers, so that homeowners and property owners find it easy and 2) we need to create mechanisms to supplement the existing financial incentives that will bridge the up-front cost gap, especially for less-wealthy homeowners. (Financing from a revolving fund loan repaid from the utility bill is one model.) The effort required to get the first 15% of water heaters retrofitted is probably an order of magnitude greater than the effort required to get the last 15% done. There is a saying in marketing—"about the time you get really sick of repeating it is about the time your audience begins to get it."<br><br>Water heaters wear out—but it takes a more concerted effort to enlist owners to retrofit buildings with leaky windows, upgrade insulation, reduce water use and install energy-efficient lighting. The return on those investments is not instantaneous, and again may require creative sources of financing. I think an untapped "made in Napa" offset program that visibly invests in emission-reducing measures right here in our community could play an important role in jump-starting building retrofits | Thank you for your comment. |
| E20.6 | David Graves | Green business standards need to embrace building decarbonization, but also need to extend its standards into the carbon-intensive side of the wine business known as fulfillment, or shipping wine to customers. Medium-payload electric box trucks are available by any manufacturers. DC fast charging can met the needs of high capacity electric semi-trucks, if the charging network expands. As stationary batteries become less expensive, more opportunities exist for VPP/DER to take advantage of local self-generation. The American Canyon Sanitary Landfill is a brownfield site that can be repurposed to become the home of a significant solar array. The Green Island Road vineyard could host a large agrivoltaics site. Both sites are near grid connections. | Please see Response #23 (wine supply chain). |
| E20.7 | David Graves | For new construction, public works agencies and private contractors should give preference to innovative materials like low-carbon concrete, mass timber, low- to-no-runoff site design, and rainwater capture etc. Stormwater capture to provide for managed aquifer recharge should be part of our response to more irregular rainfall. | Please see Response #19 (low-carbon building materials). |
| E21 | Laurie Buurma | This is to voice our opposition to the stated proposed Plan. This Plan has no environmental benefit to Napa County, it would instead be desemating an already struggling real estate market, based upon a political and unscientific view of energy.<br>Thank you, David & Laura Buurma<br>Napa | Thank you for your comment. |
| E22 | Concetta Lewis | Dear Climate Change Committee,<br>As a concerned citizen of Napa, I am writing to express my opposition to the proposed plan requiring homeowners to electrify their homes. Living in Napa is already financially challenging. Homeowners are burdened with high property taxes, escalating insurance costs, and the general cost of living. Introducing mandates that require costly upgrades—such as replacing gas appliances with electric ones—only adds to that burden. I read that you may offer low-interest loans to offset the costs, but for many residents, taking on additional debt simply isn't an option.<br>If these electrification requirements are enforced at the point of sale, they could significantly reduce any potential profit a homeowner might hope to earn from selling their property. That is neither fair nor feasible for the average resident.<br>Instead, I urge you to consider applying these requirements only to new construction, where the costs can be integrated into the building process from the start. This would ensure Napa is moving toward cleaner energy without placing the financial strain on current homeowners who are already stretched thin.<br>Please consider the real financial challenges your constituents face.<br>Climate action is important, but it must be implemented in a way that is equitable and realistic for the people who call Napa home.<br>Sincerely,<br>Concetta Lewis | Thank you for your comments. Please see Response #1 (building electrification) & #2 (energy audits). |

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| E23 | David Graves | Subject: Arithmetic of corrected Emissions<br>Engineers' measurement in 2023 of methane emissions expressed as Metric Tons Carbon Dioxide equivalent: 11,845<br>Draft Regional Climate Action and Adaptation Plan estimated value in 2019 of methane emitted from American Canyon Sanitary Landfill, Metric Tons Carbon Dioxide equivalent: 40,085 (or 42,800 in another entry).<br>Using the latter value, the Ascent Environmental emission estimate is more than 3.6 times too large. | Thank you for your comment. Please see Response #17 (solid waste). |
| E24 | Pam Reeves | Sorry I did not get these to you earlier but I wanted to see if these questions/comments are addressed within the draft status of the RCAAP.<br>1. On Page 296 of Appendices A-F under Municipal Employee Counts—Yountville is recorded as having 79 employees—that is an incorrect number by quite a large amount. I think it is closer to 36.<br>2. Upon reading what I think is the whole document—I did not see any mention of the Napa Airport. Because the Carbon Footprint of air travel has been described as very large, was the expansion of the Napa Airport included in calculations or mitigation strategies?<br>3. Looking at the partnerships that will be necessary for making the whole plan work, I feel like a very important entity was left out. Currently Insurance Companies are working at cross purposes with goals around urban forests and saving carbon sequestering trees around housing, even in suburban neighborhoods. This would be an important conversation for the county to have with Insurers who do business in Napa Valley and who are forcing actions that reduce our ability to preserve and protect the trees that serve us in so many ways.<br>Thanks for looking these over—and if I have this wrong—correcting me!!<br>Pam Reeves<br>Yountville Town Council Member | Thank you for your comments. Please see Response #9 (demographics) & #10 (air travel emissions). |

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| E25 | Ryan Nemeyer | Hello,<br>I am writing to you as a concerned constituent regarding the proposed Regional Climate Action and Adaptation Plan (RCAAP) for Napa County, specifically the Building Energy measures BE-1 and BE-2. While I strongly support responsible climate action, I believe these measures, as currently outlined, could create significant challenges for housing affordability, economic stability, and overall fairness in our community.<br>Key Concerns<br>•BE-1 (Mandatory Home Retrofits): This provision would require electric conversion of all existing homes, including appliance replacement, panel upgrades, and in some cases driveway or road work. These costs could range from tens of thousands to hundreds of thousands of dollars per household. Forcing retrofits on existing homeowners risks making an already unaffordable housing market even more inaccessible.<br>•BE-2 (Point-of-Sale Mandates for Non-Residential): Requiring disclosures, inspections, and retrofits before a property can close escrow could seriously disrupt time-sensitive transactions, especially for those needing to sell quickly. This approach adds unnecessary financial and logistical burdens on small business owners and property owners.<br>Why This is Problematic<br>•Affordability: Families are already struggling with high housing costs. Additional mandates may push more residents out of homeownership.<br>•Capacity Gaps: The infrastructure, workforce, and funding required to meet these mandates do not currently exist, making implementation unrealistic.<br>•Unfair Targeting: Homes are only a small fraction of local emissions, yet the plan places the greatest burden on individual homeowners instead of addressing larger emission sources such as transportation, solid waste, and public facilities.<br>•One-Size-Fits-All: Older homes built under pre-code conditions cannot be uniformly retrofitted. Blanket mandates will not work for every home or budget.<br>What I Support<br>•Oppose BE-1 (mandatory home retrofits) and BE-2 (point-of-sale mandates).<br>•Restructure so a menu of efficiency options are incentivized allowing property owners to choose the most cost-effective improvements for their homes.<br>•Lead by Example: All member governments should first electrify and retrofit government buildings, facilities, fleets, solid waste, and wastewater operations.<br>•Support practical, affordable solutions that don't put the burden on every homeowner.<br>I respectfully urge you to reconsider BE-1 and BE-2 and to work toward solutions that balance our shared climate goals with fairness, practicality, and housing affordability. Napa County can take meaningful steps toward sustainability without placing disproportionate burdens on families and small business owners.<br>Thank you for your leadership and for considering the perspectives of the residents you serve.<br>Sincerely,<br>Ryan Nemeyer and Alfonso Garcia<br>Global Real Estate Advisors The Nemeyer Garcia Team | Thank you for your comments. Please see Response #1 (building electrification), #2 (energy audits), #6 (implementation flexibility), & #7 (equity & affordability). |

| 5. Comments recieved in letter format | | | |
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| L1 | Napa RCD | Sept 24_25_Napa RCD_Letter.docx (see document archive on Napa County RCAAP web page) | Most comments found in this letter were answered in the Konveio Comments section. All additional comments are below. |
| L1.1 | Napa RCD | WW-7: Improve Water Efficiency & Conservation (p 108)<br>Does this also include water conservation in agriculture? Pumping water for agriculture requires a lot of energy and we still have a lot of farmers using diesel pumps. | Thank you for your comments. Please see Actions AG-1-D & AG-1-E |
| L1.2 | Napa RCD | Section 2-6. For the amount of emphasis they put on the importance of soil carbon sequestration, they mention very little how the estimates for the county were developed. They reference the Regional Carbon Stock Inventory Report (which itself references the California Natural and Working Lands Carbon and Greenhouse Gas Model) for determining the potential carbon sequestration in Napa County. This report uses very generalized estimates for the amount of carbon already in the soil and the potential rate for carbon capture through sustainable ag management practices. | Please see Response #29 (carbon stock estimates). |
| L2 | League of Women Voters | The League would like to thank the County of Napa, the Cities of American Canyon, Calistoga, Napa, St. Helena, and the town of Yountville for your collaborative effort in moving ahead with the Regional Climate Action and Adaptation Plan. We appreciate that the County is willing to undertake this important project and not wait for an official plan to tackle reducing emissions.<br>Starting in mid-2000, the League of Women Voters studied and developed a position on Climate Change. The League believes that climate change is a serious threat facing our nation and our planet. It believes that an interrelated approach to combating climate change should include energy conservation, air pollution controls, building resilience, and promoting renewable resources, which are necessary to protect public health and defend the overall integrity of the global ecosystem. Applying a climate lens to every decision we make can improve the quality of life for Napa's residents.<br>Our members are particularly concerned about the climate impact of wildfires, which go beyond immediate emissions and affect the long-term regional environment. When wildfires destroy forests and vegetation, they kill a significant tool for fighting climate change. We are specifically concerned about the black carbon feedback loop. Thank you again for your work on this critical issue. We look forward to the next stage in this process.<br>Sincerely,<br>Joyce Kingery<br>Chair of Climate Change Committee of LWV Napa County | Thank you for your comment. Please see Measure FIRE-5 & Measure AG-6. |
| L3 | North Bay Association of Realtors | Sept 26_25_NorBAR__Letter.pdf (see document archive on Napa County RCAAP web page) | |
| L3.1 | North Bay Association of Realtors | BE -1: By far the most efficient and effective means by which to reduce the use of natural gas in buildings is at the time of construction, which is already mandated via state law.<br>Require new housing and commercial projects to meet electrification or high-efficiency standards, rather than forcing retrofits on all existing homes. | Thank you for your comments. |
| L3.2 | North Bay Association of Realtors | BE-1: Provide a model where a diverse menu of efficiency options are incentivized - property owners can then choose the most cost-effective options for their homes. Homeowners should have a choice about how they can best target efficiencies with their existing properties. This could include energy efficiency improvements, partial electrification, renewable integration, or other decarbonization pathways. | Plan text has been revised. Please see Response #1 (building electrification) & #2 (energy audits). |
| L3.3 | North Bay Association of Realtors | BE-1: Better-Promote Voluntary Adoption: Provide clear, non-political information about costs, incentives, and benefits of electric systems. Incentivize households, landlords, and businesses to voluntarily reduce energy use or electrify. | Plan text has been revised. Please see Response #1 (building electrification). |
| L3.4 | North Bay Association of Realtors | Focus on Effective, Bigger Wins: More emissions (20%) are from public sector activities than all of the homes in Napa County (solid waste, wastewater). At least 75% of emissions are from non-residential sources. | Please see Response #4 (implementation). |

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| L3.5 | North Bay Association of Realtors | Transportation First: Address Napa's largest source of GHGs by expanding affordable housing, commuter incentives, EV infrastructure, electrifying/improving public transit. | Please see Response #4 (implementation). |
| L3.6 | North Bay Association of Realtors | All JPA member governments should first electrify/retrofit government buildings, facilities, fleet, solid waste, and wastewater emitters | Please see Response #4 (implementation). |
| L3.7 | North Bay Association of Realtors | Pilot and evaluate the process, challenges, and costs before mandating tens of thousands to follow suit. Provide practical models and menus by which residential, commercial, and agricultural owners can realistically adopt. | Please see Response #4 (implementation). |
| L3.8 | North Bay Association of Realtors | Secure baseline improvements and financing before creating an unfunded mandate.<br>Grid Upgrades: Strengthen local grid and expand microgrid capacity. | Plan text has been revised. Please see Response #1 (building electrification). |
| L3.9 | North Bay Association of Realtors | Energy Storage and Supply: Invest in community-scale battery storage to prevent blackouts during wildfire season. Increase solar, geothermal, and community projects. | Please see Measure BE-3. |
| L3.10 | North Bay Association of Realtors | Understand the sheer scope of Napa's housing, utilities, and administrative limitations: Napa is still uncertain whether the energy, contracting, infrastructure, planning/permitting, enforcement, and planning capacity exists. Creating permanent mandates before the JPA has certainty on these is not responsible leadership. | Please see Response #1 (building electrification) & #4 (implementation). |
| L3.11 | North Bay Association of Realtors | Preserve Neutrality and the Public Interest: Many of these solutions are identical to other jurisdictions created by consulting entities that stand to benefit financially from their adoption. | Thank you for your comment. |
| L3.12 | North Bay Association of Realtors | Reject policies that require action at the point-of-sale. This is the least efficient, least successful, least cost-effective option for any policy or regulatory change. | Plan text has been revised. See Response #2 (energy audits). |
| L3.13 | North Bay Association of Realtors | Expand RCAAP's Vision and Values: The Plan prioritizes laudable values such as environmental justice and climate equity – but what about housing affordability and economic stability, cost- effectiveness, fairness and neutrality in the public interest? | Please see Response #5 (costs & funding) & #7 (equity & affordability). |
| L3.14 | North Bay Association of Realtors | Prioritize interventions with the highest impact per dollar, such as cleaner transit, fleet electrification, wildfire prevention, and waste reduction - while also minimizing economic and social disruption. | Please see Response #4 (implementation). |
| L3.15 | North Bay Association of Realtors | The CAC's public engagement has been deficient with those that actually own or manage the homes and businesses that would be most impacted. Please deliberately work with industry and those that represent the thousands of businesses, homes, and homeowners in good faith. | Please see Response #1 (building electrification). Outreach and engagement are a priority for the RCAAP implementation process. |
| L3.16 | North Bay Association of Realtors | Our housing affordability crisis is clear, and we need your leadership – government must be the entity that respects all stakeholders, overcomes rhetoric, and makes data-driven decisions that limit unintended consequences. We remain eager to serve as a resource and partner for a sustainable Napa housing economy | Thank you for your comment. Industry partnerships are a priority for the RCAAP implementation process. |
| L3.17 | North Bay Association of Realtors | OPPOSE: BE-1: RETROFIT EXISTING BUILDINGS TO ZERO CARBON<br>While reducing building emissions is important, mandatory retrofits of all Napa homes is an inefficient, harmful approach when larger, more serious emissions remain largely mandate-free in the RCAAP. | Please see Response #1 (building electrification) & #6 (implementation flexibility). |
| L3.18 | North Bay Association of Realtors | Massive, Insurmountable Costs: The estimated cost for retrofitting a home is over highly variable especially for pre-code homes (58% in Napa) that can require panel upgrades, rewiring, driveway and/or road reconstruction, additional permitting, etc. | Please seeResponse #1 (building electrification). |
| L3.19 | North Bay Association of Realtors | The risk and cost to the housing economy should be taken seriously. A mandate of this magnitude in the face of severe capacity shortfalls in energy, grid/microgrid infrastructure, contractors, permitting, compliance – adds unrealistic pressure on the system. Coupling this mandate with this amount of insufficiency risks great harm to local housing affordability, household economic stability, and public confidence. | Please see Response #1 (building electrification). |
| L3.20 | North Bay Association of Realtors | Napa's homes are older – a tremendous amount of renovation is likely necessary.<br>o Over 58% of Napa homes (~32,000) were built before 1980 and may lack the electrical infrastructure to support full electrification.<br>o 39% (~22,000) were built prior to 1960; upgrading panels, wiring, even streets or driveways can be required to accommodate new systems.<br>o 64% use gas to heat their homes vs. 27% with electricity<br>o More are using wood (1.7%) than solar (1.4%) right now to heat their homes. | Thank you for your comment. |
| L3.21 | North Bay Association of Realtors | Neighborhood Electricity and Grid Limits: Areas of California lack transmission and/or microgrid capacity – and the availability of adequate electricity remains in question.<br>o The RCAAP acknowledges that whether or not the infrastructure will be able to support electrification has not even been confirmed.<br>o Older electrical systems may not support simultaneous operation of multiple high-load vehicles and appliances (EVs, HVAC, electric stove, dryer, water heaters). | Please see Response #1 (building electrification). |

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| L3.22 | North Bay Association of Realtors | Grid Reliability and Public Safety: More demand without prior investment means more outages and higher rates. In a world where wildfire risk and PSPS outages, the loss of options for heating, cooling, cooking, and powering essentials is a very real problem for Napa. Reliance on electric homes can compromise safety, access to heat, hot water, cooking, etc. | Please seeResponse #1 (building electrification). |
| L3.23 | North Bay Association of Realtors | Gaps in Market, Contractor, and Enforcement Capacity: The 2017 wildfires highlighted a limited availability of electricians, HVAC specialists, heat pump installers, and other skilled labor. Permitting and code enforcement capacity is already suffering ongoing delays. | Please seel Response #1 (building electrification). Plan text has been revised. See Actions BE-1-N and BE-1-T. |
| L3.24 | North Bay Association of Realtors | Making housing more expensive – makes housing more expensive. Mandates may unintentionally accelerate displacement, compromise maintenance, and/or reduce affordable housing stock. | Thank you for your comment. Please see Response #7 (equity & affordability). |
| L3.25 | North Bay Association of Realtors | Older housing stock IS the majority of Napa's housing. Pre-1980 homes have structural limitations and cannot easily accommodate electrical loads without rewiring, construction, renovation.<br>o What percentage of homes have the capability vs. need upgrades?<br>o How many permits per year are estimated (for replacements, repairs)?<br>o Are the JPA partners prepared to expeditiously manage this?<br>o How would this work in a rural, high-fire area where ~70% of the homes are single-family? | Please see Response #4 (implementation). |
| L3.26 | North Bay Association of Realtors | Up-front costs are often out of reach and disproportionately affect low/moderate-income owners.<br>o Even with rebates, electrification requires thousands in upfront cash or credit. Low-income families often don't have access to affordable financing or home equity to cover those costs.<br>o Retrofits often require temporary relocation, extensive construction, or removal of interior/exterior elements. Can take several weeks to months, disrupting families. | Please see Response #7 (equity & affordability). |
| L3.27 | North Bay Association of Realtors | Residential accounts for a relatively small portion of emissions compared to transportation, industry, and waste – all of which are in the public sector's court to make sweeping changes on.<br>o On-road transportation accounts for nearly 40% of emissions – 81% of the workforce is commuting by car, truck, or van with only 1% taking public transportation.<br>o A full 16% is coming from solid waste; waste and methane diversion can be more efficiently improved than attempting to retrofit tens of thousands of homes.<br>o At least 75% of emissions are from non-residential sources – and MORE (20%) are from public sector activities than all of the homes in Napa County (solid waste, wastewater). | Please see Response #1 (building electrification). |
| L3.28 | North Bay Association of Realtors | What is the residential-specific emissions percentage in the building energy total?<br>Residential is not specified from commercial, industrial, governmental/public, agricultural. | Please see Response #32 (building energy inventory). |
| L3.29 | North Bay Association of Realtors | Housing and Homeowners are Diverse – CHOICES are Needed for Success: A one-size-fits-all mandate ignores this diversity and places disproportionate burdens on certain homes, particularly those in older or lower- income communities where retrofits are far more complex and expensive.From 19th-century farmhouses to mid-century tract homes, to new multifamily units – Napa's housing is extremely diverse in type, age, and owner capacity | Please see Response #1 (building electrification) & #6 (implementation flexibility). |
| L3.30 | North Bay Association of Realtors | The CAC should offer a menu of options that allows homeowners to select the most practical, cost- effective, and safe upgrades for their specific property. | Please see Response #1 (building electrification). |
| L3.31 | North Bay Association of Realtors | Giving homeowners flexibility and choice not only makes compliance more achievable but also builds greater buy-in and participation, resulting in faster progress toward shared climate goals. A rigid mandate risks alienating homeowners and stalling progress. A flexible, options-based approach respects the unique character of California's housing landscape, ensures equity, and encourages responsible renovations that actually get done. | Please see Response #1 (building electrification) & #6 (implementation flexibility). |

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| L3.32 | North Bay Association of Realtors | OPPOSE: BE-2: ENERGY AUDITS FOR EXISTING NON-RESIDENTIAL (AT POINT-OF-SALE, POS)<br>Mandating inspection/repair at the point-of-sale is ineffective, slow, inherently regressive on low-income households, can wreak havoc on a transaction, and are a burden on public agencies and enforce.<br>Only ~2-3% of residential properties sell each year in Napa, and even fewer non-residential properties – meaning that only an immaterial, random fraction of properties would be subject each year, and at the most challenging time for buyers and sellers.<br>Escrow is a time-sensitive process, and a POS is a serious threat to a successful purchase/sale. Owners needing to sell immediately with a 5-day close could be seriously affected by mandatory audits and/or retrofits at the point-of-sale.<br>Even in a booming economy, a point-of-sale mandate is a fundamentally ineffective public policy due to its high costs, small public benefit, and serious consequences for home and business ownership. | Plan text has been revised. Please see Response #2 (energy audits) & #6 (implementation flexibility). |
| L4 | Napa Green | Sept 29_25_Napa Green_RCAAP_Feedback_Letter.pdf (see document archive on Napa County RCAAP web page) | Note: Letter comments have been cross referenced with comments entered into Konvaio version of the draft RCAAP by Napa Green. Comments not entered into Konveio have been added below. |
| L4.1 | Napa Green | Measure AG-7: We are supportive of these ambitious targets, and would suggest that language and goals be made consistent for winery and vineyard sustainability certifications, namely requiring that “all new vineyards be certified by 2030.” The time is now to begin certifying new vineyards. | Plan text has been revised. Please see BE-4 and AG-7. |
| L4.2 | Napa Green | Measure BE-4: As the only boots on the ground vineyard and winery certification program providing direct support to growers and vintners, reaching the goal of certifying 75% of vineyards and wineries will not be achievable without onboarding additional Napa Green team members, which will require significant funding/fundraising support from the County. Napa Green is 50% grant funded. We are struggling to identify funding opportunities to replace a CDFA grant that ended in April, and a USDA grant that was canceled that same month. | Thank you for your comment. Industry partnerships are a priority for the RCAAP implementation process. |
| L4.3 | Napa Green | Table 3.1: Our standards take a whole system approach to sustainability and climate action across Six Pillars: Water; Energy; Supply Chain; Soil Health & Biodiversity; Caring for People; all under the overarching umbrella of Climate Action & Regenerative Agriculture. This means our standards engage vintners and growers in achieving emissions reductions and drawdown across the majority of the listed strategies. | Thank you for your comment. |
| L5.1 | Winegrowers of Napa County | Several elements of the draft plan, however, appear to unintentionally penalize agriculture rather than recognize its contributions to the County’s climate and environmental goals. | Thank you for your comment. Industry partnerships are a priority for the RCAAP implementation process. |
| L5.2 | Winegrowers of Napa County | While we support the ultimate goal of reducing environmental impacts in the region, it is critical that measures do not overburden the local industry or residents. Strategies should account for feasibility, cost, and the availability of supporting infrastructure before mandates are applied. | Please see Response #5 (costs & funding). |
| L5.3 | Winegrowers of Napa County | While many operations already participate in sustainability certifications, the plan does not address the significant costs, regulatory overlap, and administrative burdens these programs impose. These costs are especially challenging for small and mid-sized growers. | Please see Response #7 (equity & affordability). |
| L5.4 | Winegrowers of Napa County | Certification should not be the sole metric of sustainability; instead, the County should recognize a wide range of verifiable practices that achieve climate goals without duplicating or layering costly requirements. | Please see Response #4 (implementation). |
| L5.5 | Winegrowers of Napa County | Many proposed electrification measures will be costly and technologically challenging. In some areas, electricity generation remains carbon-intensive, battery technology for field equipment may not be viable at scale, and mandates could exceed local grid capacity or require costly infrastructure upgrades. | Please see Response #1 (building electrification). |
| L5.6 | Winegrowers of Napa County | Additional overlap, such as groundwater regulations already addressed under SIGMA, should be avoided to prevent duplicative requirements. | Thank you for your comment. |

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| L5.7 | Winegrowers of Napa County | The plan's climate targets remain unrealistic without clear timelines, phased milestones, and sufficient technical or financial support. Without achievable benchmarks, participation from agricultural operators may be limited. | Please see Response #4 (implementation). |
| L5.8 | Winegrowers of Napa County | A phased approach, beginning with government-owned buildings and vehicles, would allow the County to evaluate feasibility before expanding requirements to commercial and residential properties. | Please see Response #1 (building electrification). |
| L5.9 | Winegrowers of Napa County | Flexibility should be offered to businesses to reduce GHG emissions in ways that best fit their operations, rather than imposing prescriptive mandates. | Please see Response #6 (implementation flexibility). |
| L5.10 | Winegrowers of Napa County | Tree canopy preservation is important, but the plan risks over-emphasizing trees at the expense of broader landscape diversity and resilience. Well-managed vineyards support biodiversity through hedgerows, pollinator-friendly cover crops, and wildlife corridors, while also contributing to long-term climate resilience. The RCAAP should reflect this interdependence, recognizing that a resilient landscape is one where diverse systems buffer each other against climate stressors. | Thank you for your comment. |
| L5.11 | Winegrowers of Napa County | The plan does not account for carbon releases from burn events, whether controlled or wildfire, in natural forests compared with vineyard areas, where carbon release is minimal. Depending on burn severity, carbon emissions from forests can erase decades of sequestration gains. Vineyards, in contrast, maintain canopy stability and avoid large-scale carbon release events, making them a predictable and resilient land use under climate stress. Without considering burn-related emissions, the plan risks overstating the benefits of tree protection and undervaluing vineyard contributions. | Please see Response #30. |
| L5.12 | Winegrowers of Napa County | Carbon sequestration should be evaluated net of burn events over time, ideally across a 30-year period. | Thank you for your comment. |
| L5.13 | Winegrowers of Napa County | Vineyard removal practices, which increasingly rely on chipping or hauling rather than burning, preserve carbon in biomass. Accurate accounting must reflect these practices to avoid penalizing vineyard agriculture. | Thank you for your comment. |
| L5.14 | Winegrowers of Napa County | If the RCAAP credits tree-based sequestration without considering wildfire emissions or sustainable vineyard practices, it may inadvertently penalize vineyard agriculture. Vineyard operations are highly regulated, climate-conscious, and contribute significantly to biodiversity, carbon stability, and resilience. Policies should explicitly recognize these contributions. | Thank you for your comment. |
| L5.15 | Winegrowers of Napa County | BE-1 (Retrofit Existing Buildings to Zero Carbon):<br>Funding, incentives, and ability for PGE to supply electric infrastructure must be confirmed before mandates are applied. Reach Codes and energy disclosure requirements may impose significant costs, particularly for older buildings. | Please see Response #1 (building electrification). |
| L5.16 | Winegrowers of Napa County | OF-2 (Zero-Emission Loading Docks):<br>Many wineries already implement no-idling policies; additional mandates may be unnecessary. | Please see Response #6 (implementation flexibility). |
| L5.17 | Winegrowers of Napa County | WW-1 (Methane Reduction from Wastewater Treatment): Methane capture may not be feasible for wineries with variable seasonal wastewater loads. The requirement for a "full evaluation" is unclear, and it appears it could require additional consulting fees and engineering studies. | Thank you for your comment. |
| L5.18 | Winegrowers of Napa County | WW-1 (Methane Reduction from Wastewater Treatment): How does this measure align with the new WDRs? | See Response #31 (wastewater). |
| L5.19 | Winegrowers of Napa County | WW-1 (Methane Reduction from Wastewater Treatment): Also, the strain on Napa County Environmental Health should be considered, as the department may not have sufficient staff to implement such requirements. | Please see Response #4 (implementation). |
| L5.20 | Winegrowers of Napa County | AG-1 (Reduce Fossil Fuel Use in Field Equipment): Full electrification is not currently feasible; policy should recognize technology limitations. | Thank you for your comment. |
| L5.21 | Winegrowers of Napa County | AG-3 (Expand Carbon Farming Practices): Practices such as reduced discing should be evaluated holistically. While reducing discing increases carbon sequestration, it may require additional mowing or impact microclimate. | Thank you for your comment. |
| L5.22 | Winegrowers of Napa County | AG-3 (Expand Carbon Farming Practices): Practices that enhance biodiversity and carbon stability should be credited. | Thank you for your comment. |
| L5.23 | Winegrowers of Napa County | Recognize a range of sustainable agricultural practices beyond certification, reducing regulatory overlap and cost barriers. | Thank you for your comment. |

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| L5.24 | Winegrowers of Napa County | Provide clear timelines, phased targets, and technical/financial support to make climate goals achievable. | Please see Response #4 (implementation). |
| L5.25 | Winegrowers of Napa County | Offer flexibility and incentives for electrification and GHG reduction, rather than prescriptive mandates. | Please see Response #1 (building electrification) & #6 (implementation flexibility). |
| L5.26 | Winegrowers of Napa County | Frame biodiversity and resilience as functions of landscape diversity, not solely tree protection. | Thank you for your comment. |
| L5.27 | Winegrowers of Napa County | Incorporate net carbon accounting that includes sequestration and release from burn events and removal practices. | Please see Response #30. |
| L5.28 | Winegrowers of Napa County | Explicitly credit vineyard practices that support biodiversity, carbon stability, and climate resilience. | Thank you for your comment. |
| L5.29 | Winegrowers of Napa County | Ensure policies do not unintentionally penalize vineyard agriculture relative to other land uses. | Thank you for your comment. |
| L6 | California Sustainable Winegrowing Alliance | Sept 30_25_CA Sustainable Winegrowing Alliance_Letter.pdf (see document archive on Napa County RCAAP web page) | |
| L6.1 | California Sustainable Winegrowing Alliance | It is essential for vineyards and wineries to have a variety of options to accommodate different farming and winemaking approaches, and therefore recognition of multiple programs is appreciated. It is also worth noting that, while sustainability programs typically cover similar issue areas, they can differ in terms of requirements, auditing protocols and other aspects. | Thank you for your comment. CSWA has been added as a partner on Measure AG-7. |
| L6.2 | California Sustainable Winegrowing Alliance | Certification was intentionally created as a voluntary option for vineyards and wineries, and vintners and growers should be given the opportunity to “opt in” rather than being required to get certified (BE-4-B). | Thank you for your comment. |
| L6.3 | California Sustainable Winegrowing Alliance | The cost of certification can be a barrier, especially for smaller and medium-sized operations and within the context of this challenging economic environment. Funding assistance will be needed to support more vineyards and wineries becoming certified (as recognized in BE-4-D and AG-7-D). | Plan text has been revised. Please see BE-4-D and AG-7-D. |
| L6.4 | California Sustainable Winegrowing Alliance | There is significant sensitivity regarding data-sharing, and therefore CSWA’s ability to help quantify GHG reductions or share data regarding reducing winery wastewater hauling would require more discussion, understanding and approval by the CSWA board and/or the certified Napa County wineries included in any aggregate datasets (BE-4-C and TR-2-B). | Thank you for your comment. |
| L6.5 | California Sustainable Winegrowing Alliance | As noted above, CCSW already encompasses many practices and measures that address climate change. The plan calls out specific practices that would be required by sustainability certification programs, some of which are overly prescriptive, costly and/or involve other barriers, and may be untenable, especially for smaller operations, e.g.:<br>OF-2-B: Coordinate with Napa Green or other similar program to include electrification of loading docks as a criterion for certification<br>WW-7-Y: Work with Napa County Green Business, Napa Green Certified Winery, and other similar sustainability programs to include the highest level of water efficiency measures as technology evolves | Thank you for your comment. WW-7-Y has been moved and renamed to WW-4-S. |
| L7 | Napa County Bicycle Coaliltion | Sept 30_25_Napa County Bicycle Coalition_Letter.pdf (see document archive on Napa County RCAAP web page) | |
| L7.1 | Napa County Bicycle Coaliltion | We were concerned that active transportation was no longer identified as a priority strategy given that, in the 2024 RCAAP Preliminary GHG Reduction Measures Matrix, “improving active transportation measures” was a CAAP Focus Measure based on GHG reduction potential, quantifiability, and feasibility. It is unclear how the consultant team arrived at this change and identified the six measures with highest GHG reduction potential, only one of which is transportation-related despite the high GHG emissions output of on-road transportation. The report itself discloses that only 17 of the 46 measures could be quantified for GHG reduction potential. | Plan text has been revised. Please see Section 3.2 Overview of Greenhouse Gas Reduction Measure Analysis in Chapter 3 of RCAAP. |
| L7.2 | Napa County Bicycle Coaliltion | Add an “Active Transportation and Micromobility Parking” transportation measure.<br>Secure and ample bike, e-bike, and micromobility (such as e-scooters) parking facilities and charging access are as crucial to the adoption of these sustainable modes of transportation as parking and charging access is to zero-emissions vehicles. As so, we believe that bike, e-bike, and micromobility parking and charging standards should be approached as a standalone measure with the same level of detail and commitment as zero-emissions vehicles receive under Measure TR-4. | Plan text has been revised. Please see TR-10-D. |

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| L7.3 | Napa County Bicycle Coaliltion | Add Short term action for recommended new "Active Transportation and Micromobility Parking" measure<br><br>For short term bike parking, we recommend including the following list of conditions:<br>•Be within 50 feet of the main entrance. 50 feet is ideal, but at a minimum we request LEED bike parking standards, which is within 100 feet of the main entrance, be met.<br>•Be readily discoverable along the likely path of travel by bicycle visitors.<br>•Be readily observable to passers-by, to discourage theft.<br>•Accommodate longer cargo and child carrier bikes for at least half the positions.<br>•Be covered by building security cameras, for all projects where external cameras are also newly installed.<br>Bicycle racks are manufactured in a variety of forms. According to the Association of Pedestrian and Bicycle Professional's (APBP) Guidelines, only u-racks, post-and-ring racks, and wheel-well- secure racks are effective for short-term bike parking. We recommend requiring these APBP- approved designs for short-term bike parking. | Thank you for your comment. |
| L7.4 | Napa County Bicycle Coaliltion | Reframe Measure TR-10 to "Improve and expand countywide active transportation system" and strengthen the language in this section to match other measures. Measure TR-10, the only measure under the active transportation strategy, is currently titled "Implement the Active Transportation Plan." While implementing the countywide Active Transportation Plan will be crucial for encouraging mode shift to active transportation, some actions may not necessarily fit under the purview of the Plan itself. We recommend that this measure be reframed as "Measure TR-10: Improve and expand countywide active transportation system" with "implement the Active Transportation Plan" incorporated as an action under the measure. | Thank you for your comment. |
| L7.5 | Napa County Bicycle Coaliltion | Add Napa County Bicycle Coaltion as a partner for Measure TR-10 | Plan text has been revised. |
| L7.6 | Napa County Bicycle Coaliltion | Add the following as co-benefits to TR-10<br>"cost savings," given reduced transportation costs for residents, reduced pavement maintenance, and public health costs for municipalities;<br>"economic opportunities," for creating jobs around active transportation network build-out and non-infrastructure initiatives related to education and encouragement, strengthening local bicycle business, and promoting bicycle tourism; and<br>"social cohesion" given improved social connections and sense of community formed through walking and biking compared to driving and promotion of equity in improving mobility and access to low-income residents who cannot drive due to cost or ability. | Plan text has been revised. |
| L7.7 | Napa County Bicycle Coaliltion | Target goals for Active Transportation Plan implementation should be identified. | Thank you for your comment. |
| L7.8 | Napa County Bicycle Coaliltion | TR-10-A: Change to "Adopt and implement the forthcoming Countywide Active Transportation Plan." NVTA is not the only entity that adopts and implements this plan; each jurisdiction has the responsibility to do so as well. | Plan text has been revised. |
| L7.9 | Napa County Bicycle Coaliltion | TR-10-B: Change beginning of sentence to "Work with NVTA to secure funding…" and<br>change "consider opportunities to implement…" to "pursue opportunities to implement…" | Thank you for your comment. |
| L7.10 | Napa County Bicycle Coaliltion | TR-10-C: Remove "Support NVTA's efforts to" so that this action reads "Report annual jurisdiction-level progress…" | Thank you for your comment. |
| L7.11 | Napa County Bicycle Coaliltion | TR-10-D: Upgrade from an action to a more thorough measure around bicycle, e-bike, and micromobility parking and charging standards as discussed earlier. | Please see Response #33 (transportation & micromobility). |
| L7.12 | Napa County Bicycle Coaliltion | TR-10-E: Rewrite to "Work with NVTA to evaluate bicycle parking opportunities. Install secure bicycle parking in downtowns and key retail…" to clarify that jurisdictions themselves will install the bicycle parking. | Thank you for your comment. |

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| L7.13 | Napa County Bicycle Coaliltion | Expand Measure TR-7 to include micromobility and active transportation modes as zero- emission vehicles or create a new, separate measure similar to TR-7 that directs jurisdictions to “Increase Residential Micromobility/Active Transportation Adoption.”<br>Measure TR-7 focuses solely on funding and incentives for alternative fuel vehicles and includes no actions encouraging residents to adopt use of micromobility such as e-scooters, e-bikes, and cargo bikes, as modes of transportation. These modes offer important climate benefits, given the reduced resources required to create and fuel them compared to cars and reduced pollution from tire wear. Increasing e-bike and e-micromobility is not necessarily addressed in the purview of the Active Transportation Plan; consequently, promoting these modes as climate- friendly options and encouraging residents to utilize them must be explicitly outlined in the RCAAP. Actions should include working with NVTA, community-based organizations, businesses, and potentially the state to provide e-bike incentive/rebate programs. | Please see Response #33 (transportation & micromobility). |
| L7.14 | Napa County Bicycle Coaliltion | Strengthen the role of education in Measure TR-15. Measure TR-15, “Empower Community to Choose Active Transportation Options” is the only measure listed under the “Transportation Education” strategy, yet omits primary methods of active transportation education. The short- term actions appear more focused on “encouragement” efforts rather than “education” efforts, and the long-term action is vague. While “encouragement” is an important component of mode shift towards active transportation, it must also be accompanied by “education” to ensure safe and confident active transportation adoption. Working with local partners, including nonprofits and businesses, to provide free bicycle safety education opportunities to the community should be included as both a short- and long-term action. | Plan text has been revised. Please see TR-15-D and TR-15-F. |
| L7.15 | Napa County Bicycle Coaliltion | We recommend adding as a short-term action, “continue partnering with other jurisdictions and nonprofits to secure Safe Routes to School funding to provide bicycle and pedestrian safety education,” and as a long-term action, “establish ongoing SRTS funding for secured and expanded Safe Routes traffic safety education.” | Plan text has been revised. Please see TR-15-C and TR-15-F. |
| L7.16 | Napa County Bicycle Coaliltion | Add "local schools" as a partner | Plan text has been revised. |
| L7.17 | Napa County Bicycle Coaliltion | It is also unclear from the listed actions what Visit Napa Valley’s role as a partner is in this measure, as there is a separate measure focused on transitioning visitors away from Single Occupancy Vehicles. | Plan text has been revised. |
| L7.18 | Napa County Bicycle Coaliltion | Measure TR-1: Reduce VMT Countywide – this measure does not discuss the multitude of VMT reduction strategies beyond transit-first policy. This measure should be more accurately renamed, or the listed actions should be more representative of the diverse strategies to reduce VMT. | Plan text has been revised. Please see TR-1-C. |
| L7.19 | Napa County Bicycle Coaliltion | Measure TR-3: Expand EV Charging Infrastructure – include language that requires charging stations to have a plug-in outlet for e-bikes or micromobility charging, which would also offer climate resiliency to residents experiencing power outages. | Thank you for your comment. |
| L7.20 | Napa County Bicycle Coaliltion | Measure TR-11: Expand Transportation Demand Management Programs – add businesses, nonprofits, and schools to list of partners, and expand scope of actions beyond NVTA as the sole provider of TDM efforts. | Plan text has been revised. |
| L7.21 | Napa County Bicycle Coaliltion | Measure TR-13: Reduce Vehicle Miles Traveled of Visitors to Napa County – add businesses and nonprofit organizations as potential partners in this measure. | Plan text has been revised. Measure has been renumbered from TR-13 to TR-12. |
| L7.22 | Napa County Bicycle Coaliltion | Measure TR-14: Reduce Minimum Parking Requirements – specify that this applies to vehicle parking requirements. Include actions or language that convey that reduced minimum vehicle parking requirements should be paired with improved transit access and bicycle parking requirements in order to successfully encourage mode shift. | Plan text has been revised. Please see Action TR-13-A. Measure has been renumbered from TR-14 to TR-13. |
|  | Napa Schools for Climate Action | Sept 30_25_Napa Schools for Climate Action_recommendations.pdf (see document archive on Napa County RCAAP web page) |  |
| L8.1 | Napa Schools for Climate Action | the RCAAP should clearly state the 2030 net zero goal and provide a roadmap to achieve it. If this roadmap is not provided in the RCAAP, we would like an explanation as to why not, and what is planned to compensate for the added climate pollution that results. | Please see Response #3. |
| L8.2 | Napa Schools for Climate Action | As recommended in the RCAAP, and in solidarity with other<br>jurisdictions who already have taken the lead, new and expanded gas stations should be prohibited throughout all of Napa County. If a jurisdiction is unwilling to make this commitment, we would like an explanation as to why not, and what is planned to compensate for the added climate pollution. | Thank you for your comment. County staff is currently evaluating this as a policy. |
| L9 | Napa Valley Vintners | Sept 30_25_Napa Valley Vintners_Letter.pdf (see document archive on Napa County RCAAP web page) |  |

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| L9.1 | Napa Valley Vintners | With limited federal, state and private industry resources available to support new and costly local regulatory requirements, agricultural producers have significant concerns about how the RCAAP could feasibly be implemented. | Please see Response #5 (costs & funding). |
| L9.2 | Napa Valley Vintners | The infrastructure and systems required to implement many of the proposed strategies either do not exist or lack sufficient capacity to meet the stated objectives. Many strategies will require regulatory or legislative changes, private sector investment, or other modifications that are beyond the control of Napa residents and government. An example is Measure AG-1, which would require expanding electrification and require the widespread availability of electricity/charging stations. Those infrastructure investments cannot be reasonably relied upon to occur. | Thank you for your comment. |
| L9.3 | Napa Valley Vintners | while it is helpful to envision the breadth of emission-reducing possibilities within our community, including the broad range of smaller measures that lack carbon savings estimates in the plan effectively overwhelms decision making and adds implementation expenses to the plan that may deliver limited GHG reductions. | Please see Response #4 (implementation). |
| L9.4 | Napa Valley Vintners | A prioritized approach ranking measures on an impact-to-cost curve would better serve the plan's objectives and resource allocation and should be completed prior to adoption. | Please see Response #4 (implementation). |
| L9.5 | Napa Valley Vintners | To understand what the fiscal impacts of the RCAAP, stakeholders and policymakers need confidence in the cost estimates. The RCAAP provides preliminary cost estimates for implementing all 19 measures selected for analysis ($1.1 billion over 20 years, or $57 million per year), implementation of nine priority GHG reduction measures ($772 million over 20 years) and the implementation of 10 priority climate adaptation measures ($359 million over 20 years). However, these estimates carry an acknowledged accuracy range of -30 to +50 percent of actual costs. This substantial margin of error undermines the utility of these projections and limits policymakers' and stakeholders' ability to make well-informed decisions regarding RCAAP adoption. | Please see Response #5 (costs & funding). |
| L9.6 | Napa Valley Vintners | As written, we are concerned that the draft RCAAP charts the course for package of costly mandates for local governments, businesses and residents without clarity around what measures should be prioritized for the greatest impact and who will ultimately bear the cost s for implementation. Specificity on how these measures will be paid for and who will shoulder the burden is necessary information for all stakeholders, especially policymakers. More details need to be provided to properly evaluate the proposal prior to adoption | Please see Response #4 (implementation), #5 (costs & funding), and text revisions to Chapter 6. |
| L9.7 | Napa Valley Vintners | Measure BE-1 calls for retrofitting 25% of existing residential and non-residential buildings to carbon zero by 2030 and 100% by 2045. This measure, if fully implemented, would account for 9% of all greenhouse gas reductions from human-caused emissions in the region by 2045. However, funding has not yet been identified to support implementation. This creates significant concern that an extremely high-cost measure could be adopted without a clear financing mechanism, potentially placing an exceptionally high economic burden on homeowners and business owners. | Please see Response #1 (building electrification) |
| L9.8 | Napa Valley Vintners | Measure WW-7: Resource consumption (water, power, etc.) for residential, municipal, and non-residential uses should be contextualized to effectively identify inefficient users across all sectors and scales. For example, within Short Term Action WW-7-G, the total water use by entity provides limited insight compared to normalized metrics such as water usage per unit of production—whether measured by property size, planted acres, permitted gallons of wine produced, or permitted number of customers served. | Thank you for your comment. Action has been moved and renumbered from WW-7-G to WW-4-G. |
| L9.9 | Napa Valley Vintners | Measure TR-12: Measures that could discourage visitation should not be included in the RCAAP. This measure recommends considering 'tourist taxes' and 'paid parking at wineries or events' to replace anticipated lost gas tax revenue from reduced future gasoline sales. While studies may demonstrate that such restrictions can increase public transportation use, carpooling, and walking/biking, they fail to account for the economic impact on businesses. Napa County currently lacks the transit infrastructure and population density necessary to achieve reduced vehicle miles traveled without significantly harming the business environment. | Plan text has been revised. Measure TR-12 has been removed. |

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| L9.10 | Napa Valley Vintners | Measure All-6 and Fire-6: The RCAAP includes several actions that duplicate existing legislative or regulatory requirements. If the intent is to establish standards beyond current mandates, this should be explicitly stated within the document, along with a clear framework for implementation and enforcement. For example, actions ALL-6 and FIRE-6 address areas already covered by Cal/OSHA standards for indoor and outdoor heat illness prevention and wildfire smoke protection. | Plan text has been revised. See Measures All-6, Fire-6, and Temp-1. |
| L9.11 | Napa Valley Vintners | Measure OF-2-B calls for coordination with "Napa Green or other similar program to include electrification of loading docks as a criterion for certification." The wording in sections addressing sustainability certification should remain advisory rather than prescriptive. Some language in these sections appears to impose new requirements for existing programs rather than provide guidance. This language should be revised or removed to maintain an appropriate advisory role. | Thank you for your comment. |
| L9.12 | Napa Valley Vintners | Measure SW-1: Please quantify how much the proposed measures exceed existing state diversion requirements. | Thank you for your comment. |
| L9.13 | Napa Valley Vintners | For Short Term Action SW-1-E, please clarify if the "Mandatory Commercial Food Waste Diversion Program" would eliminate the option for food facility permit holders to self-compost. | Plan text has been revised. |
| L10 | Kevin Miller | Sept 30_25_Kevin Miller_Solid Waste_City of Napa_Letter.pdf (see document archive on Napa County RCAAP web page) | Thank you for your comment. See Community Partners & Resources section of the RCAAP Storymap. |
| L11 | Chris Benz | Please share this comment with the Council.<br>We would like to thank you for moving forward with the Regional Climate Action and Adaptation Plan. It's a pretty big deal—to commit, as an entire county, to taking action on climate change. And it's a common-sense strategy: as a rural county with a low population, we can be more effective with a regional approach.<br>The Plan will help you evaluate and prioritize future actions, but we applaud you for not waiting for an official plan to tackle reducing emissions.<br>There appears to be confusion on the part of the public about how the Plan will be implemented. The plan provides a list of actions that will reduce emissions of climate pollutants. What actions are prioritized will depend on the community's opportunities, available funding, and what actions your Council deems most relevant.<br>At the Napa County Climate Action Committee meeting this Friday, there will be a presentation of a new tool ("Total Climate Accounting") that can assist with prioritizing actions based on how much excess heat is eliminated. A pilot study was conducted by Napa Recycling and Waste Services using this tool to evaluate their composting operation and the possible addition of an anaerobic digester.<br>The Adaptation Strategies in the Plan will be useful because they can provide a 'climate lens' to evaluate future projects. For example, can we plant more street trees during this repaving project to provide shaded parking and a cooler neighborhood? Can pavement for a project be porous so that rainwater can be collected and stored as groundwater?<br>The RCAAP can help you put a climate lens on every decision you make, and, by doing so, improve the quality of life for the city's residents by making the air cleaner, the water supply more secure, and neighborhoods greener and cooler. Please keep moving forward with the RCAAP and with climate action as a high priority.<br>Thank you.<br>Chris Benz<br>Napa Climate NOW! | Thank you for your comment. Please see Response #4 (implementation) and text revisions to Chapter 6. |

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| L12 | Richard Seiferheld | Although I serve on the St. Helena ATSC committee, these comments reflect my personal views only and do not represent the committee or any other party.<br>Overall, the draft report is well organized and clearly states the Plan's goals and objectives. The documentation of climate change issues is strong and supported by solid data.<br>That said, the Plan has significant shortcomings. The most critical is its failure to address funding for implementation and monitoring. Success will require additional staff, yet the report assumes federal support will cover gaps between state and local funding. If those funds do not materialize, city and county budgets will be forced to absorb the costs at the expense of essential services. Given the current federal administration's position on climate policy, the Plan should confront these risks directly and propose contingencies. Furthermore, frequent references to DEI and environmental justice, while important, may actually disqualify the Plan from federal funding sources.<br>Another concern is whether the data projections through 2040 fully account for the greenhouse gas impacts of state-mandated housing growth (over 204 new units, including Hunter and the Spring Street projects) and the likely addition of one or more hotels.<br>Finally, the projections appear to assume ongoing growth in agriculture and tourism at historic rates. Recent indicators suggest these sectors may slow or even decline. The Plan should acknowledge this uncertainty and adjust its assumptions accordingly. | Please see Response #1 (building electrification) & #8 (demographic forecast). |
| L13 | Chris Benz | Meeting: Special Joint City Council/Open Space, Active Transportation, and Sustainability Commission<br>Item: 1.) Napa Regional Climate Action and Adaptation Plan<br>eComment: We would like to thank you for moving forward with the Regional Climate Action and Adaptation Plan. You are taking a big step forward-committing, as an entire county, to taking action on climate change. And it's a common-sense strategy: as a rural county with a low population, we can be more effective with a regional approach. The Plan will help you evaluate and prioritize future actions, but we applaud you for not waiting for an official plan to tackle reducing emissions. You.have already prevented additional fossil fuel gas stations. You have supported all-electric housing projects. You are making active transportation safer and more attractive with every street repaving project. Thank you! The Adaptation Strategies in the Plan will be useful because they can provide a 'climate lens' to evaluate future projects. For example, Do you need to set aside additional land for wetlands expansion to protect against future sea level rise? Can native plants and porous pavement be incorporated into projects to reduce water use and increase rainwater retention? Putting a climate lens on every decision you make improves the quality of life for American Canyon residents by making the air cleaner, the water supply more secure, and neighborhoods greener and cooler. Please keep moving forward with the RCAAP and with climate action as a high priority. Thank you. Chris Benz Napa Climate NOW! | Thank you for your comment. |

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| L14 | Chris Benz | To the Mayor and Yountville Town Councilmembers,<br>We would like to thank you for moving forward with the Regional Climate Action and Adaptation Plan. You are taking a big step forward-committing, as an entire county, to taking action on climate change. And it's a common-sense strategy: as a rural county with a low population, we can be more effective with a regional approach.<br><br>The Plan will help you evaluate and prioritize future actions, but we applaud you for not waiting for an official plan to tackle reducing emissions. You have already reduced pollution by banning gasoline-powered leaf blowers. You have provided EV charging stations at the City Hall. And you are reducing plastic waste and its emissions by prioritizing refillable water bottle stations. Thank you!<br><br>The Adaptation Strategies in the Plan will be useful because they can provide a 'climate lens' to evaluate future projects. For example, Do you need a local microgrid to handle future power outages? Can native plants and porous pavement be incorporated into projects to reduce water use and increase rainwater retention?<br><br>Putting a climate lens on every decision you make improves the quality of life for Yountville residents by making the air cleaner, the water supply more secure, and neighborhoods greener and cooler. Please keep moving forward with the RCAAP and with climate action as a high priority.<br><br>Thank you. Chris Benz<br>Napa Climate NOW! Napa resident | Thank you for your comment. |