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To: [MeetingClerk](#); [Gutierrez, Jesse](#)
Subject: Napa Climate Action Committee Meeting April 24, 2026 - Public Comment on Agenda Items 5.B and 5.Cs 5.1 and 5.2
Date: Wednesday, April 22, 2026 6:11:29 PM
Attachments: [Draft RCAAP Comments St. Helena and CAC Summary of Recommendations.pdf](#)
[Draft RCAAP Comments St. Helena and CAC.pdf](#)

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CART BEFORE THE HORSE

Dear Climate Action Committee Members and Staff:

Agenda Items 5.B and 5.C at your meeting on April 24, 2026 request the Climate Action Committee to approve a plan for drafting an implementation plan and a \$182,000 proposed budget for an implementation plan for the RCAAP *before* the RCAAP is actually presented to the public and the Committee for final review, comment and approval -- and *before* the Committee has approved the actual RCAAP measures, their costs and benefits, the required CEQA review of the measures, and -- most importantly -- the source of funding for residents, businesses and public agencies to implement and comply with the final RCAAP as adopted after the required further public review.

This is an **imprudent, arbitrary form of "cart before the horse" and unreasonable decision-making and prejudgment.** The Committee should postpone work on a "RCAAP implementation plan" until the actual, final proposed RCAAP is available, including evaluation of implementation and compliance costs to the residents, businesses and public agencies in the Napa Valley, along with an evaluation of the sources to fund those implementation and compliance costs.

I attach my prior comments filed with the Committee last September which raise these specific issues regarding the draft RCAAP. I respectfully request that the Committee respond to and modify the draft RCAAP as requested by these comments and the comments of other interested parties and Napa jurisdictions and make the revised draft available for public comment. The Committee should complete its evaluation and public review of a proposed final draft RCAAP **BEFORE** embarking on an "implementation plan" and additional expenditures of \$182,000 for a final draft RCAAP that has not yet been reviewed by the public, the Committee, and the jurisdictions represented on the Committee. Working on an "implementation plan" is premature and prejudicial before the legal and environmental reviews are completed that are required before its final adoption.

Thank you for your consideration of my comments. My comments are personal only and not in any official capacity or representing any entity.

Christopher J. Warner
1434 Grayson Avenue
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Christopher J. Warner
Preliminary Comments on
Draft Napa Regional Climate Action and Adaptation Plan
September 19, 2025¹

Summary of Recommendations

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 evaluations, consideration of 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.²

- 1. 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 RCAAP in response to the environmental and legal reviews are completed and available to the public.**

- 2. RECOMMENDATION: The Draft RCAAP should not be considered and adopted until realistic sources of funding and budgets for the \$1.1 billion in governmental costs of implementing the plan are identified and assured, particularly in light of severe current reductions in available state and federal funding.**

- 3. 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. Specific benefit-cost evaluations are required for the mandatory building electrification measures that would force Napa homeowners, schools, hospitals, offices, restaurants, stores, hotels, wineries, government buildings and other property and building owners to stop using their gas appliances and retrofit and rewire all**

¹ These comments are solely personal and individual, and not provided in any official capacity and not on behalf of any third party or entity.

² These comments do not address the potential changes in assumptions in the Napa greenhouse gas inventory used in the draft RCAAP, which appear to assume that any changes in greenhouse gas emissions since the 2019 data used in the inventory, such as changes in vehicle miles traveled (VMTs) or water consumption due to COVID, water rate increases, or other factors, should be excluded from the GHG inventory. See draft RCAAP, Appendix B, Greenhouse Gas Inventory Memorandum, November 29, 2022, p. 1 (“The update year of 2019 was selected because this was the latest year in which data were most complete and excludes data anomalies due to the COVID-19 pandemic starting in 2020, such as reduced transportation emissions from increase telecommuting.”)

their existing residential and non-residential buildings at an average cost of \$30,000-\$100,000 per home and building, and require electrification of all new housing and buildings. Other potentially costly mandatory measures would be imposed on municipal water and waste disposal systems; existing wineries, vineyards and agriculture; residential water uses and rates; home hardening; vehicle use by commuters, visitors and residents; availability of public parking, etc. None of the mandatory measures and programs should be adopted until specific cost estimates and benefit-cost evaluations are completed for each measure and program.

- 4. RECOMMENDATION: The procedural schedule should be modified to consider and complete the changes to General Plans, Housing Elements, zoning and building codes and local climate plans that would be required prior to adoption and implementation of the Draft RCAAP.**
- 5. RECOMMENDATION: The confusion as to whether the Draft RCAAP is intended to require new, mandatory measures unanimously agreed to by all participating jurisdictions and/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.**
- 6. RECOMMENDATION: The equity and affordability analysis of the Draft RCAAP and its impacts on vulnerable and disadvantaged communities should be developed and included prior to any consideration of the Draft RCAAP by participating jurisdictions and the public.**
- 7. RECOMMENDATION: The Draft RCAAP should not be considered by the participating jurisdictions and the public until the estimated compliance costs to the public and all affected stakeholders are included in the Draft RCAAP.**
- 8. RECOMMENDATION: The Draft RCAAP’s proposed mandatory residential and non-residential building electrification measures 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 appraisals that impact property tax revenues.**
- 9. 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.**

Christopher J. Warner
Preliminary Comments on
Draft Napa Regional Climate Action and Adaptation Plan
Submitted to
St. Helena City Council, September 23, 2025 Meeting, Agenda Item 13.1
And to Napa Climate Action Committee
September 19, 2025¹

Summary.

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.²

Discussion.

As a threshold matter, the Climate Action Committee staff should be commended for providing a draft regional climate action plan for initial public consideration. The work put into the Draft RCAAP so far is extraordinary, particularly for its recommendation of voluntary actions that members of the public can take themselves to address climate change.

¹ The following are preliminary comments on the Draft Napa Regional Climate Action and Adaptation Plan (Draft RCAAP). These comments are personal, and not in any official capacity or representing any third party or entity. These preliminary comments will be supplemented as more information and content are added to the Draft RCAAP.

² These comments do not address the potential changes in assumptions in the Napa greenhouse gas inventory used in the draft RCAAP, which appear to assume that any changes in greenhouse gas emissions since the 2019 data used in the inventory, such as changes in vehicle miles traveled (VMTs) or water consumption due to COVID, water rate increases, or other factors, should be excluded from the GHG inventory. See draft RCAAP, Appendix B, Greenhouse Gas Inventory Memorandum, November 29, 2022, p. 1 (“The update year of 2019 was selected because this was the latest year in which data were most complete and excludes data anomalies due to the COVID-19 pandemic starting in 2020, such as reduced transportation emissions from increase telecommuting.”)

However, as discussed below, 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.

The Draft Plan must be modified to answer the following three basic questions, before it can be considered by the public and participating jurisdictions:

- *How much will it cost Napa residents, businesses, schools, hospitals and local governments to comply with the Draft Plan?*
- *Where will Napa local governments get the \$1.1 billion in funding required just to implement and enforce the Draft Plan?*
- *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?*

Comments on RCAAP Procedural and Legal Status, and Schedule for Adoption

1. Lack of Required Environmental and Legal Reviews.

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.

³ February 20, 2025 CEQA Approach Memorandum submitted to the Climate Action Committee, pp. 5- 6, 11 (“Due to the deferential standard of review and high degree of legal defensibility, as well as the anticipated potential for significant (and perhaps unavoidable at the program-level) impacts, Ascend encourages the preparation of a PEIR for the RCAAP”).

Additionally, municipal and state regulations that prohibit the 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.

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.

2. Lack of Funding for Local Government Costs of Implementing the Draft RCAAP.

The Draft RCAAP includes no assured funding to cover the \$1.1 billion-\$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.

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.

3. Lack of Modifications and Consistency Reviews of Jurisdictions’ General Plans, Housing Elements, Hazard Mitigation Plans, Local Climate Plans, Zoning Codes, Building Codes, Etc.

The Draft RCAAP’s procedural schedule includes no schedule for the required modifications to the participating jurisdictions’ General Plans,

⁴ *Cal. Rest. Ass’n v. City of Berkeley*, 89 F.4th 1094 (9th Cir. 2024).

⁵ Appendix I, “Cost and Funding Analyses” of the RCAAP indicates that the “implementation” point-cost estimate of \$1.1 billion may range 30% higher, i.e. to as high as \$1.4 billion. Appendix I, p. I-2.

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.

RECOMMENDATION: The procedural schedule should be modified to 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.

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”.

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. 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.

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.

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.

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.

Comments on Substantive Omissions in the Draft RCAAP

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.

Contrary to California and federal standards on new government regulations and projects,⁶ 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.⁷

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

⁶ See, e.g., OMB Circular No. A-94, Guidelines and Discount Rates for Benefit-Cost Analysis of Federal Programs; [Transportation Economics | Caltrans](#); [Benefit-Cost Analysis | Organizing and Planning for Operations - FHWA Office of Operations](#); [Benefit Cost Analysis \(BCA\) | Mass.gov](#) [Benefit Cost Analysis \(BCA\) | Mass.gov](#) ; the social cost of carbon used in GHG-related benefit-cost evaluations is a monetary estimate of the damage caused by emitting one ton of carbon dioxide. The monetary value used by the federal government has ranged between \$51-\$255 per ton, with discount rates of 3% and 7%. The lack of benefit-cost evaluations in the draft RCAAP is not a new issue for Napa climate planning. See Napa Register article, August 17, 2018 at [Napa County's draft climate action plan has its critics | News | napavalleyregister.com](#).

⁷ Draft RCAAP, p. 3-3; pp.3-4- 3-6, Table 3-1. Inexplicably, Table 3-1 at pp. 3-4- 3-6 lists 47 targeted measures with 30 lacking any quantification of greenhouse gas reductions, while p. 3-3 lists 46 targeted measures.

RCAAP is submitted to the Napa jurisdictions and the public for consideration.

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.

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.

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.⁸

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.

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.**

⁸ Appendix I, “Cost and Funding Analyses” of the RCAAP indicates that the “implementation” point cost estimate of \$1.1 billion may range 30% higher, i.e. to as high as \$1.4 billion. Appendix I, pp. I-2, I-4. The “implementation cost” estimates for each mandatory measure include some nominal estimates of rebates to offset compliance costs, but none of the rebates would offset actual compliance costs. For example, the “rebates” estimated for building electrification retrofits of all existing buildings would be limited to \$2,000 per residential building and \$3,500 per non-residential building, far less than the current market costs for such retrofits. Appendix I, Attachment I-1, Estimate 1, Sheet 2, lines 7 and 8.

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.

2. The Costs of the Mandatory Greenhouse Gas Reduction Measures and Climate Adaptation Measures Are Likely Significant and Potentially Unlawful.

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.⁹

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.

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

⁹ Draft RCAAP, “Measure BE-1: Retrofit Existing Buildings to Zero Carbon, pp. 3-10- 3-12; Appendix H, Implementation Matrices, Action BE-1-F, p. H-1.

¹⁰ Appendix I, p. I-4.

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.¹¹

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.)**

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.

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.

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.

Other costly measures recommended by the Draft RCAAP include:

- a. **Green Certification of All Wineries.** Require all new wineries, winery retrofits, and additions greater than 10 percent to comply

¹¹ City of Napa Housing Authority, Resolution approving Laurel Manor building electrification project, September 2, 2025 (\$2.5 million total estimated costs for 50 housing units= \$50,000 per unit; PG&E Supplemental Testimony, California State University- Monterey Bay zonal electrification project, Table 1-3, p. 1-13, November 15, 2024 (\$30,499 per unit cost for electrification); PG&E 2027 General Rate Case, Alternative Energy Program workpapers, May 15, 2025 (\$100,000 per unit costs of electrification).

¹² Draft RCAAP, “Decarbonize New Buildings,” pp. 3-16- 3-17; Appendix H, Action No. BE-5-A, p. H-4.

with “sustainability certification” standards, targeting 75 percent of all existing vineyard acreage to be certified by 2030.¹³ No cost estimates are provided.

- b. **Restrict fossil fuel use by agricultural field equipment** and irrigation pumps, replace with renewable electricity only.¹⁴ No cost estimates are provided.
- 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.
- d. **Require and mandate reusable food ware and waste reduction,** and commercial food waste diversion.¹⁶ No cost estimates are provided.
- e. **Restore and re-forest 20% of all areas affected by wildfire** since 2017.¹⁷ No cost estimates are provided.
- f. **Require all existing and new residential and commercial structures to implement “home hardening”** to protect against wildfires.¹⁸ No costs estimates are provided.
- 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.
- h. **Multiple mandatory measures requiring municipal infrastructure, equipment and vehicles to be retrofitted or**

¹³ Draft RCAAP, “Measure BE-4: Increase Sustainable Wine Certification;” p. 3-15; “Measure AG-7: Increase Sustainable Vineyard Certification;” pp. 3-67- 3-68; Appendix H, Action No’s BE-4-B, 4-E, AG-7-F, pp H-4, H-27.

¹⁴ Draft RCAAP, Appendix H, Action No’s AG-1-A- AG-9-C generally, pp. H-24- 28.

¹⁵ Draft RCAAP, Appendix H, Action No’s TR-1-C- TR-14-C, OF-2-A, OF-2-C, generally, pp. H-6- - H-14.

¹⁶ Draft RCAAP, Appendix H, Action No’s SW-1-B, SW-1-D, SW-1-E, pp. H-14- H-15.

¹⁷ Draft RCAAP, “Measure AG-6: Restore Woodland and Forest Habitat,” pp.3-65- 3-66.

¹⁸ Draft RCAAP, Appendix H, Action No’s ALL-3.2, p. H-29.

¹⁹ Draft RCAAP, Appendix H, Action No’s WW-3-A, 3-F, 4-C, 4-E, 5-A, 5-B, 5-C, 7-E-7-I, 7-V, 7-X, 7-Y, 7-Z, pp. H-19- H-24.

replaced to achieve greenhouse gas reduction and climate adaptation standards.²⁰ No cost estimates are provided.

RECOMMENDATION: These additional measures and programs should not adopted until specific cost estimates and benefit-cost evaluations are completed.

**Respectfully submitted,
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²⁰ Draft RCAAP, Greenhouse Gas Reduction and Climate Adaptation Measures, generally as applicable to municipal and governmental buildings, facilities, utility infrastructure, equipment and vehicles.