

From: [David Graves](#)
To: [Joelle Gallagher](#); [Gutierrez, Jesse](#)
Subject: GHG Inventory in the RCAAP
Date: Friday, September 26, 2025 1:14:27 PM

[External Email - Use Caution]

Dear Chair Gallagher:

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.
David Graves

Sent from my iPhone

From: [Bordona, Brian](#)
To: [Crosby, Jamison](#); [Gutierrez, Jesse](#); [Melendez, Ryan](#)
Subject: Fw: Public Comment for the Napa Climate plan (RCAAP)
Date: Tuesday, September 30, 2025 2:16:24 PM
Attachments: [image001.png](#)
[image003.png](#)
[image002.png](#)

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From: Hoskins, Neha <neha.hoskins@countyofnapa.org>
Sent: Tuesday, September 30, 2025 12:55:10 PM
To: Bordona, Brian <Brian.Bordona@countyofnapa.org>; Parker, Michael <Michael.Parker@countyofnapa.org>
Cc: Cooper, Paulette <paulette.cooper@countyofnapa.org>
Subject: FW: Public Comment for the Napa Climate plan (RCAAP)

FYI – see public comment below.

From: ClerkoftheBoard <clerkoftheboard@countyofnapa.org>
Sent: Tuesday, September 30, 2025 12:52 PM
To: Alsop, Ryan <ryan.alsop@countyofnapa.org>; CRAIG, REBECCA (Becky) <Becky.Craig@countyofnapa.org>; Bratton, Sheryl <sheryl.bratton@countyofnapa.org>
Cc: Cooper, Paulette <paulette.cooper@countyofnapa.org>; Hoskins, Neha <neha.hoskins@countyofnapa.org>; Morgan, Greg <Greg.Morgan@countyofnapa.org>; Williams, Anthony <anthony.williams@countyofnapa.org>
Subject: FW: Public Comment for the Napa Climate plan (RCAAP)

****Board of Supervisors Bcc'd****

Good afternoon,

Please see the public comment below.

Thank you,



Paulette Cooper
Deputy Clerk of the
Board II

Pronouns: She/Her/Hers
[\(why this matters\)](#)

Napa County Executive
Office
1195 Third Street, Suite
310 | Napa, CA 94559
Phone: 707-253-4580

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From: Laurie Buurma <laurie.buurma@compass.com>
Sent: Tuesday, September 30, 2025 12:13 PM
To: ClerkoftheBoard <clerkoftheboard@countyofnapa.org>
Subject: Public Comment for the Napa Climate plan (RCAAP)

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.

Thank you, David & Laura Buurma
Napa

Comments on the Napa Cities/ County RCAAP

Thanks for the opportunity to comment.

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 the 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 an lot at American Canyon Sanitary Landfill does not.

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 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.

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 Data Report for the Geeral Plan is well-suited to cataloging and verifying plant communities areas and varying categories of land use.

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.

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](#). 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.”

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 retrofits.

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 manufacturer. DC fast charging can meet 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 agrovoltaic site. Both sites are near grid connections.

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.

These comments, while covering many topics, are not the last word on these topics.

David Graves
459 Randolph Street
Napa
707-486-2038

From: [Kevin Miller](#)
To: [Deborah Elliott](#); [Melendez, Ryan](#)
Cc: [Gutierrez, Jesse](#); [Timothy Kittel](#); [Briggs, David](#); [Griffis, Amanda](#); [Tim Dewey-Mattia \(Napa Recycling\)](#); [Lederer, Steven](#)
Subject: Solid Waste Measure Comments for RCAAP from City of Napa
Date: Tuesday, September 30, 2025 7:56:23 PM
Attachments: [image002.emz](#)
[image003.emz](#)
[City of Napa Disposal Reduction Policy - CC Reso # R2012 100 - 7-24-12.pdf](#)
[Ordinance O2010 18 - City of Napa C&DD Recycling - 10-19-10.pdf](#)
[Construction-and-Demolition-Debris-Recycling-Information-and-Frequently-Asked-Questions.pdf](#)
[R2022-008 - Signed City of Napa SB 619 NOIC to CalRecycle.pdf](#)

Dear Deborah and Ryan,

The draft RCAAP comment period deadline kind of snuck up on me, but I did post the following comment in *green text* below (and this is my follow-up email as I wasn't quite sure who to send it to at Ascent).

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.

- First Attachment is the City of Napa's 2012 City "Disposal Reduction Policy" that I refer to in the above comment.

Second Attachment is the City of Napa's C&D Recycling Ordinance referenced above.

- Third Attachment is the current FAQs on the C&D ordinance issued every time a Waste Reduction & Recycling Plan (WRRP) is approved by the City for a project covered by the ordinance.
- Fourth Attachment is the "Notice of Intention to Comply" multi-year plan submitted to CalRecycle in 2022. The City is on track to fulfill everything noted in the SB 1383 implementation plan with the final major compliance step being the establishment of full composting programs for multi-family (MF) complexes within the City limits that had no previous collection of compostable organics. Although not currently required by SB 1383, the City's plan is to revisit all MF complexes that only had yard trimmings service to capture food scraps and soiled paper as well (with food scraps being a major source of methane emissions when landfilled).

I realize the above only represent programs and policies for the City of Napa, but I know other jurisdictions throughout Napa County have similar programs and policies that should be researched and documented. This may not be appropriate for the RCAAP itself, but it would be useful information for implementation of the solid waste measures of the RCAAP once adopted. - KM

Kevin Miller | Materials Diversion Administrator (Recycling Manager)

City of Napa | Utilities Department – 1700 2nd Street, Suite 100 | Napa, CA 94559

Mailing Address | P.O. Box 660 | Napa, CA 94559-0660

☎ 707.257.9291 | 📠 707.257.9522 | ✉ kmiller@cityofnapa.org



From: [Christopher J Warner](#)
To: [RCAAP](#); [MeetingClerk](#)
Cc: [Michelle Deasy](#); [Maya DeRosa](#)
Subject: Re: Additional Preliminary Comments on Draft Regional Climate Action and Adaptation Plan and Schedule, Building Electrification Measures, and Agenda Item 5.A, Napa Climate Action Committee Meeting, September 26, 2025
Date: Saturday, September 27, 2025 9:23:41 AM

[External Email - Use Caution]

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!

Christopher J. Warner

On Sat, Sep 27, 2025 at 7:49 AM Christopher J Warner <chrisjwarner52@gmail.com> wrote:

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.

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.

Thank you for your consideration of these additional preliminary comments on the draft RCAAP.

Christopher J. Warner
1434 Grayson Avenue
St. Helena, CA 94574
chrisjwarner52@gmail.com

On Tue, Sep 23, 2025 at 10:05 PM Christopher J Warner <chrisjwarner52@gmail.com> wrote:

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.

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/zzDdnlcNEp0>

These comments are my personal comments only, not in any official capacity and not representing any third party or entity.

Thank you!

Christopher J. Warner
1434 Grayson Avenue
St. Helena, CA 94574
chrisjwarner52@gmail.com

MEASURE BE-1: Retrofit Existing Buildings to Zero Carbon

With Napa County’s population expected to grow by 18 percent from 2019 to 2045, existing buildings will constitute most building energy-related emissions in the future. Napa County Jurisdictions will develop and implement voluntary energy retrofit programs for existing residential and non-residential buildings to transition

25 percent of existing buildings to zero carbon by 2030 and 100 percent by 2045. These programs include financial incentives, streamlined permitting, and community outreach to facilitate the transition to cleaner energy use.

Strategy

Clean and Efficient Energy Use in Existing Buildings

Applicable Jurisdictions

All

GHG Reduction Potential

2030	38,703 MTCO ₂ e
2035	57,957 MTCO ₂ e
2045	36,412 MTCO ₂ e

Partners

- ▶ Bay Area Air District
- ▶ Bay Area Regional Energy Network (BayREN)

- ▶ Metropolitan Transportation Commission (MTC)/Association of Bay Area Governments (ABAG)
- ▶ Pacific Gas and Electric Company (PG&E), Marin Clean Energy (MCE), and other utilities
- ▶ Certified Electrical Safety Compliance Professional (CESCP)
- ▶ BayREN Codes & Standards
- ▶ Chambers of Commerce

Targets

- ▶ 25 percent of existing buildings are zero carbon by 2030
- ▶ 100 percent of existing buildings are zero carbon by 2045

Co-Benefits



Cost Savings



Economic Opportunity



Energy Security



Public Health & Wellbeing

SHORT-TERM ACTIONS

BE-1-A: Secure funding to support the implementation of energy efficiency and electrification actions.

BE-1-B: To prepare for building electrification, work with local and regional agencies such as Bay Area Air District, BayREN, MTC/ABAG, PG&E, MCE, or others, to create a pre-electrification program that provides affordable financing or rebates or other incentives, depending on funding available, for electric panel upgrades. Begin by annually identifying buildings with natural gas water heaters or furnaces within 2 years of their average service lifetime, based on dates of original permits. Once identified, reach out to property owners to present the available incentives. Identify if electric panel upgrades are needed to support full building electrification. Also, determine if the building is suitable for on-site renewable energy (e.g., solar) and battery storage. Confirm with PG&E that the electric infrastructure will be able to support widespread or neighborhood-level electrification, and if not, work with PG&E to identify a timeline for upgrades.

BE-1-C: Voluntary Reach Codes Standards: Work with the CECSP to develop reach-codesvoluntary standards and associated cost-effectiveness studies that must be met for existing buildings. The reach codes-standards will include the following voluntary performance standards or other similar voluntary standards that achieve equivalent GHG emission reductions:

- i) Existing residential buildings' modeled energy efficiency score under the voluntary standards should ~~must~~ meet or exceed half of the maximum cost-effective score at time-of-retrofit (note: "modeled energy efficiency score" means the building's energy efficiency score as calculated by a CEC-approved compliance software program, such as the California Building Energy Code Compliance [CBECC] software.)
- ii) Voluntary standards for eExisting nonresidential buildings ~~must~~ should seek to reduce their non-electricity-related emissions by 19 percent by 2030, and 75 percent by 2045.

BE-1-D: Voluntary Reach CodesStandards: Determine voluntary reach ~~code-standard compliance~~ triggers for retrofits, which may be based on one or more metrics such as percent of existing floor area, building permit valuation, or project valuation.

BE-1-E: Voluntary Reach CodesStandards: Conduct stakeholder outreach with building industry members, contractors, residents, businesses, and other interest groups to present the reach ~~code-standard~~ options and solicit feedback.

BE-1-F: Voluntary Reach CodesStandards: Adopt ~~an ordinance~~ voluntary standard(s) to ~~implement and enforce~~ encourage compliance with the new reach ~~code~~ standard(s) for existing buildings. ~~Pursuant to new statewide residential building code update limitations in Assembly Bill (AB) 130 (signed into law on June 30, 2025), a residential reach code may not be adopted and enforced until in 2031; however, nonresidential reach code adoption and enforcement may proceed starting in 2026.~~

BE-1-G: Voluntary Reach CodesStandards: Conduct training for permitting staff to understand the reach code ~~requirements~~ voluntary standards for existing buildings and how ~~compliance will be demonstrated to~~ encourage voluntary compliance.

BE-1-H: Voluntary Reach CodesStandards: Develop a tracking system for the types of measures implemented to maximize energy efficiency and decarbonization, energy efficiency upgrades, or pre-wiring completed by voluntary applicants pursuant to voluntary reach ~~code requirements~~ standards for existing buildings.

BE-1-I: Streamlined Permitting for Electrification: Review the existing permitting processes for building owners seeking to replace fossil-fueled equipment with electric equipment and modify as needed to reduce complexity, cost, and processing time for any required permits.

BE-1-J: Streamlined Permitting for Electrification: Waive or reduce permitting fees for building retrofit projects that convert mixed-fuel buildings to all-electric and cap natural gas lines, to encourage exceedance of existing code requirements. Additionally, waive or reduce penalties/fees for prior non-permitted work that is upgraded for code compliance. Fee reduction may require modification of local fee ordinances.

BE-1-K: Community Outreach and Education: Develop a community outreach program that provides education strategies that enable and encourage energy conservation and gas-to-electric conversions in residential and commercial buildings for space and water heating. Program elements could include developing and/or sharing existing online educational materials targeted to building owners and tenants that are hosted on the jurisdiction's websites on energy efficiency and building electrification; promoting training, fact sheets, information on available incentives, video tutorials, and links to existing content (such as The Switch is On). Educational materials and resources should also be provided as part of routine regulatory processes, such as

applying for or renewing licenses or permits. Examples of incentives currently available (and subject to change) include:

- i) MCE's Residential and Commercial energy efficiency programs.

- ii) Energy Efficient Commercial Buildings Deduction tax credits program (179D).
- iii) Homeowner Managing Energy Savings (HOMES) rebate program.
- iv) High-Efficiency Electric Home Rebate (HEEHRA) program.

BE-1-L: Develop a revolving loan fund to provide low-interest loans to low-income residents to cover the time- of-replacement/emergency replacement of natural gas water heaters and/or HVAC units with electric options, ensuring that loans can be processed quickly and efficiently with equitable procedural access. Pursue grant funding opportunities to seed the revolving loan fund.

BE-1-M: For non-agricultural and agricultural operations, work with MCE to improve participation in the Commercial Energy Efficiency, Strategic Energy Management (SEM), and Agricultural and Industrial Resource (AIR) programs. Identify barriers that limit the current participation rate (e.g., knowledge about the program, program funding). Develop a plan to address the barriers to the program with the aim to reduce non- residential energy use by 25 percent by 2030 from 2019 levels.

LONG-TERM ACTIONS

BE-1-N: Secure long-term funding to continue offering energy efficiency, electrification, and other net zero carbon rebates based on demand and progress toward the measure goal.

BE-1-O: Provide a sliding schedule of rebates that offers more rebates in the short term and less in the long term, with a sunseting date that expires unless renewed. The schedule will depend on the amount of funding available.

Continue implementation of the pre-electrification program, adjusting for any improvements needed to increase participation such that 100 percent of buildings have the electric infrastructure to support full electrification.

BE-1-P: Voluntary Reach CodesStandards: Each jurisdiction will review their existing building voluntary reach codes-standards at the release of each triennial building code cycle to ensure that the voluntary reach codes-standards do not conflict with new cost-effective electrification pre-wiring and energy efficiency measures, such that the existing voluntary building reach codes-standards are in line with the most recent decarbonization guidance and cost-effectiveness data.

BE-1-Q: Continue to streamline permitting and electrification program outreach, making any improvements in light of any challenges presented from implementation of other actions to achieve the goal of 100 percent electrification by 2045.

BE-1-R: For homes not eligible for BayREN/MCE programs, research opportunities to work with local financial institutions (e.g., credit unions, banks) to offer zero or low percent financing for a limited time (e.g., 24 months) or on a sliding scale based on income (e.g., 24 months for income over 50 percent of median, 48 month for income less than 50 percent, with increasing APRs after). Jurisdictions may consider helping to pay for interest for the first two years to fund loans.

From: [Christopher J Warner](#)
To: [RCAAP](#); [MeetingClerk](#)
Cc: [Michelle Deasy](#); [Maya DeRosa](#)
Subject: Re: Additional Preliminary Comments on Draft Regional Climate Action and Adaptation Plan - Mandatory Building Electrification Measure BE-1
Date: Sunday, September 28, 2025 4:25:34 PM
Attachments: [RCAAP Comments Benefit Cost Evaluation Measure BE-1.pdf](#)

[External Email - Use Caution]

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.

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.

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:

Thank you for your consideration of these additional preliminary comments.

Christopher J. Warner
1434 Grayson Avenue
St. Helena, CA 94574
chrisjwarner52@gmail.com

Draft Napa Regional Climate Action and Adaptation Plan
September 28, 2025
Additional Preliminary Comments on Draft RCAAP – Mandatory Building Electrification
Measure BE-1
Submitted by Christopher J. Warner

Please include in the public record and comments on the Draft RCAAP the following benefit-cost evaluation of the Draft RCAAP mandatory Building Electrification Measure BE-1.

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.¹

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:

Benefit-cost calculation/ratio using Draft RCAAP cost estimates and Social Cost of Carbon:

\$1,461,558- \$6,611,810 /
\$359,870,000 (net present value) – \$448,380,000 (nominal) =
0.003 – 0.018

Benefit-cost calculation/ratio using alternative more likely cost estimates and Social Cost of Carbon:

\$1,461,558 / \$560 million - \$1.68 billion = **0.003- 0.001**
\$6,611,810 / \$560 million - \$1.68 billion = **0.012 -0.004**

Thank you for your consideration of these additional preliminary comments on the Draft RCAAP.

¹ Net total RCAAP GHG emissions reductions: 386,653 MTCO₂e, Draft RCAAP, p.3-8; Percentage of net total RCAAP GHG emissions reductions attributable to building electrification measure BE-1 : 9%, Draft RCAAP, p.3-8; Net RCAAP GHG emissions reductions attributable to building electrification measure BE-1: 34,799 MTCO₂e, Draft RCAAP, p.3-8; Cost of building electrification measure GHG emissions reductions using Draft RCAAP cost estimate of \$448,380,000 (nominal) - \$359,870,000 (net present value), p.6-3 and Appendix I, p. I-5; Table I-2, p. I-8 based on \$2,000 and \$3,500 per rebate: \$12,885 per MTCO₂e (nominal) and \$10,341 per MTCO₂e (net present value); Cost of building electrification measure GHG emissions reductions per MTCO₂e using cost estimate of \$10,000- \$30,000 per each of 56,000 existing residential buildings: \$560- \$1.68 billion (nominal), or \$16,092- \$48,277 per MTCO₂e (nominal); Social Cost of Carbon (SCC) used by federal government, California and other states for benefit-cost evaluations of GHG emissions reduction measures during Obama and Biden Administrations: \$42- \$190 per MTCO₂e, see [What is the social cost of carbon? | Brookings](#) ; [Biden Administration Unleashes Powerful Regulatory Tool Aimed at Climate - The New York Times](#); Environmental benefits of incremental GHG emissions reductions from Measure BE-1 using Social Cost of Carbon approved by Obama and Biden Administrations: 34,799 MTCO₂e x \$42- \$190 Social Cost of Carbon = \$1,461,558- \$6,611,810.

November 10, 2025

To Napa County Climate Action Committee

I spoke previously to this committee and stated I would be providing you the costs to upgrade a home to all electric.

That cost is over \$33000 and does not include permits, stove, water heater, heating and air conditioning systems and costs of under grounding utilities, if required. See attached.

I use the example of a Westwood home that is some of our less expensive housing. Placing a requirement that even in 20 years that these homes are to be all electric is a huge financial burden.

Suggestions of grants or bank loans is unreasonable.

There is not enough grant money to meet all these homes and asking banks to lend money for these retrofits, the owner still has to pay it back. These are some of our most affordable homes and these owners are stretched already to own one of these homes.

Requiring a point of sale retrofit causes many problems, such as does all work need to be done before selling the home? This will cause major delays and financial hardships on sellers that need or want to sell. It can cause problems to buyers that are getting loans that could be delayed months while this retrofitting is being completed.

How about a buyer or seller, due to many factors, needs to sell or purchase and close within 15 days? Those would not happen, thus another hardship caused by government requirements.

Please remove the retrofitting of all electric housing requirement.

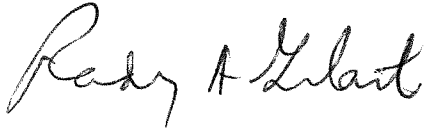
Some other ideas if you really believe there is a climate crisis.

Have all government buildings retrofitted to all electric.

Have all public officials, that believe this needs to be done, retrofit their

own homes and their investments. This will give them an understanding of the financial hardship this will place on property owners. You may be able to afford it, but that is your choice.

Lead by example, give property owners a choice.

A handwritten signature in black ink, reading "Randy A. Gularte". The signature is written in a cursive, flowing style.

Randy Gularte



Estimate

Date	Estimate No.
8/29/2025	76

93 Chelsea Ave.
Napa CA 94558

Name/Address

SKN Construction Inc.
5350 Washinton St.
Napa Ca. 94558

Description	Qty	Rate	Total
Electric Conversion on average house. 3 Ton GE Connect Heat Pump Air Handler and Ducting •Install 3 ton GE Appliances NS18H36HA5 Residential Heat Pump, 3 ton, 33.4 Kbtu/hr Heating, 208-240 VAC, 1 ph Model # GECNS18H36HA5 •Install 3 ton GE Appliances, NAM36V1TA5S, Air Handler, 3 ton Nominal, 36000 Btu/hr Cooling, 208/230 V, 1 ph, 60 Hz Power Source, TXV Control, R-454B Refrigerant, Variable Speed Motor Model # GECNAM36V1TA5S •Install copper linest 50' 3/4" x 3/8" with communication wire. •Install 3/4" pvc drains. •Install 30 Amp disconnect at air handler. •Install 60 amp disconnect at outdoor unit with fuses. •Install Rectorseal Surge Protector. 5 year limited warranty on parts. 10 year limited warranty on compressor honored through Pace supply. All work performed is covered by a 1 year warranty through LH Heating & Air. Warranty to be voided if equipment is serviced by another company.		13,500.00	13,500.00
Total			\$13,500.00

Phone #
7073633543

E-mail
Lhheatingandair@gmail.com

DeGraw Electrical Contractors

4134 Fairfax Dr
Napa Ca 94558
707 363 1428
degrawelectrical@gmail.com
Lic# 907078

Estimate

Estimate No: 136
Date: 09/05/2025

For: SKN Construction /Kevin Nickerson
Sknbuilds@outlook.com
(707) 637-6944

Description	Quantity	Rate	Amount
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Converting from gas to electric appliances	1	\$0.00	\$0.00
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My name is Brandon DeGraw, and I own DeGraw Electrical Contractors here in Napa. I've been asked to write a letter concerning the proposed idea of switching to all electrical services in Napa county doing away with natural gas. In my opinion, this is just crazy talk. Let's just start with our electrical infrastructure. We don't have the grid to carry all of that extra load. It's bad enough that when it gets warm outside, we're told not to run our air conditioners or ovens due to insufficient grid capacity. Now you want to go all electric. Maka that make sence. im not sure you can.It would literally take years and hundreds of millions of dollars, which would ultimately be paid for by us, the consumer. Then there's the time and money that it would take to convert your average home to all electric. Let's get into that.	1	\$0.00	\$0.00
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Your average home has a tanked gas water heater, and most often, in newer homes, you will see a gas tankless water heater. To convert from gas to electric on a tanked water heater, you would need to hire a plumber to install the heater and an electrician to power it up. For a standard tanked water heater, you're probably going to be looking at around \$750.00 to \$1,200. If the home owner has a tankless and wants to go electric for there tank less, which in most cases would require a main electrical service upgrade due to the simple fact the the water heater is going to require a minimum 100a 250v circuit. All in for a tankless water heater and a service upgrade could end up costing homeowners up to \$20,000.00 depending on the panel location. We also have to think about gas ovens and cooktops. Again, there is more money that homeowners would have to spend. I've seen electric appliances range anywhere from 30a 250v all the way up to 80a 250v. Once again, it's probably another service upgrade. With costs possibly reaching the \$20,000.00 mark. How do you expect folks to bear that kind of financial burden. Our home heater mostly comes from natural gas furnaces, which would also need to be converted to electric heat pumps. Again, there is more money out of homeowners' pockets

In closing, the grid can't handle it, and the majority of folk out here can't afford to have this jammed down there throats.

Brandon DeGraw
DeGraw Electrical Contractors