



June 18, 2019

Napa County Planning Commission
Joelle Gallagher, Chair, District 1
1195 Third Street, Suite 305
Napa, CA 94559

RE: Input on the DRAFT Napa County Climate Action Plan

Chair Gallagher & Members of the Napa County Planning Commission,

On behalf of the North Bay Association of REALTORS®, I am writing to offer input, share concerns, and make important inquiries about the Draft Climate Action Plan.

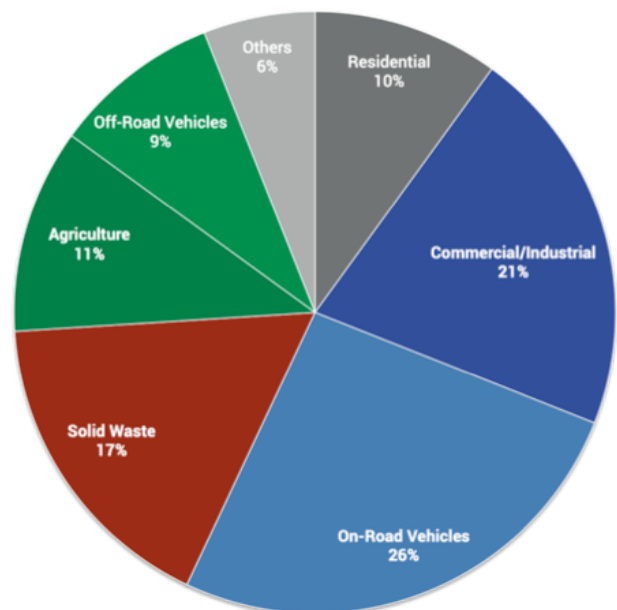
1. **Climate change is a shared responsibility** – cities should be included as they contribute a range of inseparable emissions in most sectors, and we can make much more progress together.
2. **Homeowners account for ~10% of emissions and are unduly prioritized** – other sectors outpace residential in both emissions and opportunities.
3. **The most complex/concerning measures for residential owners include** – requiring new and replacement water heating systems to be electrically-powered, requiring energy audits and all upgrades prior to issuing any building permits, and the transfer of residential landscaping to non-exempt status.
4. **Imposing costly mandates on residential during a housing crisis runs counter to our public goals.**
5. **Decision-makers and municipalities can first lead by example** – our electeds and municipalities should lead the piloting and adoption of proposed measures (residential, County/City buildings, fleets, etc.).

Why are homeowners and housing prioritized for mandates

first? Of the 9 sectors, residential emissions account for 10%, trailing behind transportation, commercial/industrial, agricultural, and solid waste.

On-road vehicles (26%), solid waste (17%), agriculture (11%) all include **incentive-based measures – funding, technical assistance, and a general spirit of collaboration.** Building & Energy Use includes mostly mandates with major, complex impacts on homeowners.

Residential is offered notably fewer incentives than other sectors, many with higher levels of emissions. New construction would be required to exceed building standards by 15%(+); some on-road vehicles require conversion to alternatives - others not mandated to rise to similar thresholds.



MEASURES

BE-4: Requiring new or replacement residential water heating systems to be electrically-powered or alternatively-fueled (e.g., solar thermal, ground-source heat pump). Launching the CAP with a series of costly requirements on residential, ignoring higher emissions in other sectors, runs counter to our housing crisis and public goals.

Concerns & Inquires

- What are the benefits and consequences of converting to all-electric on a community scale?
- Many homes could require thousands in upgrades to the existing panel/system to accommodate. What percentage of homes have the capability vs. need upgrades?
- What other accessory/additional equipment, and subsequent vendor is needed – cost?
- What are the monthly energy cost differences?
- How will emergency situations work – it could take weeks to plan, permit, install a new system/technology?
- How many units are there – how many permits per year are estimated (for replacements, additions/alterations)? Is the County prepared to expeditiously manage this?
- What type of financial assistance will be in place?

BE-9: Require energy audits for major additions or alterations of existing buildings.

Permit applicants would be required to incorporate all cost-effective improvements into the project per the recommendations of the audit. The County reports applications for ~300 permits/year. This would include ADUs, those adding onto homes to house relatives/seniors, create rental opportunities, etc.

BE-8: Measure BE-8 Work with PG&E, BayREN, MCE, PACE financing programs, and other regional partners to incentivize energy efficiency improvements in existing buildings.

PACE liens are superior to private liens (mortgages); lenders are not subject to uniform disclosures, and it can be difficult for borrowers to compare to more conventional credit lines. FHA, Fannie Mae and Freddie Mac have refused to back mortgages on properties with PACE loans because of these risks. Please facilitate a range of financing options.

Residential Landscaping

- **WA-1: Amend or revise water conservation regulations for landscape design** - Expand its existing water conservation ordinance to include homeowner-provided landscaping projects.
- **WA-2: Adopt a new water conservation ordinance for commercial and residential land uses limiting outdoor watering.** Limiting outdoor watering to 2 days/week, staggering allowable watering days, banning lawn and landscapes, car washing, etc.

§ 18.118.020 exempts residential landscaping. Requirements for landscape documentation include 12 reports, designs, and calculations (completed by a licensed/certified architect, contractor, designer, etc.). This measure deserves serious reconsideration. Transforming the regulatory process for gardens and landscaping should only be considered as part of a community and industry-wide conservation strategy.

New Housing

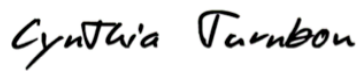
- OR-1 & OR-2: Require Tier 4 equipment, and the use of renewable diesel for all construction activity and mining operations as a condition for approval by 2030
- BE-1: Requiring CALGreen Tier 1 Green Building Standards and Tier 1 Building Energy Efficiency Standards for eligible alterations or additions to existing buildings

The success of these measures relies on coordination with local utilities and organizations, participation from the community, and administration of new or revised local policies and programs (p 3-5). Current and future homeowners will be particularly impacted by this proposal – we are disappointed that meaningful engagement with homeowners and real estate professionals has not occurred.

Please ensure a unified, County/City climate policy. A CAP that includes the County and Cities would present a more accurate account of our shared obligations – especially as cities attempt to meet escalating housing goals. Regional impact analysis and subsequent obligations would prove more objective, more accurate, more effective.

Thank you for your consideration. We are eager to work in partnership with you on policies that impact housing and property rights in Napa County. Should you have any questions, please contact Lisa Badenfort, Public Affairs Director, at (707) 636-4294, or lisa@northbayrealtors.org.

Respectfully,



Cynthia Turnbow, Chair
Local Government Relations Committee

The North Bay Association of REALTORS® is a four-county trade association representing over 3,500 real estate professionals and affiliates. We serve as an advocate for housing and homeownership, the preservation of property rights, and a thriving real estate economy. In addition to advocacy, we serve as a collaborator and resource to decision-makers and the public on the persistent quality of life issues facing the North Bay.

cc:

Supervisor Brad Wagenknecht, District 1
Joelle Gallagher, Planning Commissioner District 1

Supervisor Ryan Gregory, District 2
Dave Whitmer, Planning Commissioner District 2

Supervisor Diane Dillon, District 3
Anne Cottrell, Planning Commissioner District 3

Supervisor Alfredo Pedroza, District 4
Andrew Mazotti, Planning Commissioner District 4

Supervisor Belia Ramos, District 5
Jeri Hansen, Planning Commissioner District 5

David Morrison, Director of Planning, Building, and Environmental Services