November 28, 2022 Staff Report to the Natural Resources Commission

Attachment 3 – Comments from the Utilities Commission CAAP Subcommittee

Attachment 4 – Comments from Cool Davis

Dear City of Davis CAAP Team and City Council,

In March of 2021, the Utilities Commission (UC) appointed a liaison to work with City Staff and the Natural Resources Commission (NRC) to attend meetings and provide feedback on the City of Davis' development of the 2020 Climate Action and Adaptation Plan (CAAP). Over the last year and a half, a member of the UC has attended and provided feedback to City Staff and its consultants on the areas of the CAAP that overlap with the scope of the UC. It is important to emphasize how much overlap there is between the CAAP and the UC's functions that were charged from City Council (Resolution No. 19-121):

The Utility Rate Advisory Commission shall have the responsibilities as provided in this section and such other duties as the Council may, from time to time, determine:

1. *To recommend rate setting principles and reserve policies for Davis utilities; annual or multi-year adjustments to the City's utility rates; and technologies, pilot programs and initiatives for City Council consideration and potential staff evaluation; and*
2. *To consider applicable City goals and policies and incorporate them into utility policies; costs associated with providing utility services; utility customer needs and satisfaction with utility services; short and long term factors and consequences identified in rate studies; information provided by city utility managers, the City Council, and City advisory commissions, especially the Natural Resource Commission (NRC) and Finance and Budget Commission (FBC); current and potential future state regulations and policies, industry experience and best practices; and*
3. *To evaluate and compare options to improve utility service and/or change the scope and methods of service delivery; social and economic equity effects of utility service and rate options on different segments of the Davis community; utility rates and rate structures of other communities to assist with informing policies for Davis; and long-term strategies to achieve service value and efficiency, resiliency, environmental sustainability, and other City objectives.*

Based on the need to provide rigorous technical review of the CAAP deliverables and to elevate issues to the UC for further action by the commission, the UC voted to form a UC CAAP Subcommittee in September of 2021. Since then, the UC CAAP subcommittee has provided regular updates to the UC as well as provided technical feedback to City Council, City Staff, consultants, and the NRC on CAAP deliverables. Despite a long year and a half process to get the complete CAAP draft, the UC CAAP Subcommittee is pleased to report that there has been an overall positive impact on the CAAP draft. Many of the UC CAAP Subcommittee's recommendations and areas of concern with respect to the impacts on utilities within the City's scope have been addressed. Some of the notable inclusions are reflected in the priorities actions which include upgrading city accounts with Valley Clean Energy to the Ultragreen plan (Action A.7), creating of microgrids and resiliency hubs (Action A.8), addressing flooding risks to utility infrastructure (Action D.4), and implementing greenstorm water systems (Actions B.1, C.1, D.1, and D.3).

While the CAAP team successfully integrated many of the City of Davis documents and plans that are impacted by climate hazards, we remain concerned about the on-going integration and coordination between the finalized CAAP and those plans (i.e. Urban Water Management Plan, Recycled Water Management Plan, Solid Waste Management Plan, Downtown Plan, ect.). The UC CAAP Subcommittee recommends that the City explore technology options such as “IBM Doors” to integrate requirements and plans in order to maximize its efficiency and effectiveness in implementing them going forward.

It is important to note that the UC CAAP Subcommittee focused its review on city operated utilities (drinking water, wastewater, and solid waste) and not electricity delivery or generation (Valley Clean Energy) which operates under a Joint Power Authority (JPA) and is not solely within the control of City of Davis policy or planning. The UC CAAP Subcommittee found this final review to be particularly challenging as previous feedback was not tracked or communicated to the community between deliverables and revisions related to the CAAP over the last 18 months. For future CAAP revisions and updates, the UC CAAP Subcommittee strongly encourages City Staff to maintain a comment resolution tracking mechanism so that community members, advisory members, and city commissioners can not only track the progress of identified issues, but can also feel that there is transparency and accountability in the entire process.

The UC CAAP Subcommittee’s recommendations are broken down into two parts. First, the subcommittee identified high-level concerns that are not tied to a specific section of the draft CAAP. Second, the subcommittee identified issues with sections of the draft CAAP that are summarized in Attachment A of this report as a table.

High-Level Concerns

1. **Vulnerability Assessment**

In October of 2021, the UC CAAP Subcommittee evaluated the process and framework of the vulnerability assessment to the best practices in the California Adaptation Planning Guide (California Office of Emergency Services, 2020) and cited it in the draft CAAP. Both the guide and the City’s vulnerability assessment cite the vulnerability as a function of exposure (whether the asset is located in an area that will be impacted), sensitivity (degree to which an asset may be affected if exposed), and adaptive capacity (the ability to adjust to mitigate potential damage).

The UC CAAP Subcommittee identified areas of concern and recommendations, and forwarded those to the City Council in November of 2021. To this date, the UC CAAP Subcommittee has not received a response and the draft CAAP contains the same disconnects across the following topics that impact the prioritized actions for City operated utility services:

- There is no analysis on the adaptive capacity of any identified city asset. Without assessing the adaptive capacity, the City is not able to fully assess each asset's vulnerability and make the best use of its limited resources.
- Solid waste is not identified as a city asset and is absent from any actions in the CAAP.
- The spatial areas affected by flooding are narrow in scope. The FEMA 100 and 500 floodplains are based solely on natural phenomena. It does not consider the impacts of flooding from dam failures, which are categorized as technological hazards and different in geographic extent and impact (See mapping in Appendix B). The State of California maintains dam inundation areas and dam safety risk ratings that should be used to assess the exposure of each asset, particularly for critical City operated utilities. The City of Davis is within high risk and far reaching inundation zones of both the Indian Valley Reservoir and Lake Berryessa.
- The sequential steps and processes identified in the California Adaptation Planning Guide were not followed. Community outreach and engagement following the vulnerability assessment did not take place.

The UC CAAP Subcommittee remains concerned that the climate hazards and resilience of city assets were not adequately analyzed following the methodology cited in the draft CAAP. Many of the city assets with the most impact and climate risk relate to City operated utility services. The UC CAAP Subcommittee strongly recommends revising the vulnerability assessment making any adjustments to the prioritized actions in the CAAP as a result. Of particular interest and expertise from work on the UC, the UC CAAP subcommittee recognizes that city utilities lack adequate power back up. This would have been identified in the adaptive capacity analysis that is missing from the vulnerability assessment. As a result, the UC CAAP subcommittee encourages City Staff to further analyze the climate hazards of power outages with respect to maintaining essential City operated utilities and develop appropriate resiliency strategies (i.e. backup power).

2. Municipal Broadband Internet

In 2019, City Council received a final report and set of recommendations from the Broadband Advisory Task Force (BATF). During its final report presentation to City Council, the BATF advocated for the City to explore multiple scenarios of technical engineering and financial models in order to not only deploy a community owned and operated broadband utility, but to pave the way for future local economic development. Despite inequitable access to affordable and reliable high speed broadband internet in 2019, City Council decided to not pursue a city operated broadband utility for reasons that are still not understood by the UC CAAP Subcommittee.

Following the COVID-19 pandemic transition to increased remote work and learning, the analysis of transportation-related greenhouse gas (GHGs) emissions in the CAAP (74% of GHGs in 2016), and the foundational work of the BATF that highlighted the economic, consumer, and societal benefits of improved broadband infrastructure within Davis, the UC CAAP Subcommittee strongly recommends that municipal broadband internet should be

reevaluated under a broad set of circumstances and models to meet the climate challenges of the future. The draft CAAP should be revisited to reestablish a task force to develop recommendations for city operated broadband utility. This should include initiating a new feasibility study with multiple technical infrastructure and financing scenarios (not a single scenario like the BATF was restricted to in 2019). Hardening the broadband infrastructure in Davis has the potential to significantly decrease the existing digital divide, reduce the GHG inventory for the largest contributing source (transportation), and drive economic development locally within Davis (create local jobs). As the BATF identified, municipal broadband internet is the superior model for the City of Davis based on its potential to not only provide better services and increase consumer choice, but to also dismantle the digital divide that for-profit providers have created in the City of Davis in the last decades. There are various federal and state funding opportunities to address broadband infrastructure and it is up to the City to pursue them by developing a comprehensive study and plan.

3. Solid Waste Reduction and Groundwater Sustainability

A significant portion of the 2016 GHG inventory originates from City operated utilities (excluding Valley Clean Energy): wastewater treatment (3%), solid waste disposal (3%), and water supply (<1%). Currently, Chapter 4.2.14 of the draft CAAP contains the goal, “Reduce waste generation and increase diversion away from landfills.” The rationale for not having prioritized actions for this goal conflicts with earlier discussions of the GHG inventory and Senate Bill 1383, *California’s Short-Lived Climate Pollutant Reduction Strategy*, in Chapter 3. Currently, the only actions for solid waste reduction are considered “Additional Action Items for Consideration” and are therefore not part of the 28 prioritized actions listed earlier in Chapter 4. The UC CAAP Subcommittee is concerned that the draft CAAP does not adequately analyze or prioritize the solid waste utility as a major source to the City’s GHG inventory. It is the subcommittee’s recommendation that the CAAP should integrate and align with other major initiatives that the City is undertaking to reduce GHGs from solid waste (i.e. SB1383).

The draft CAAP has a single mention of groundwater in Chapter 3 within the vulnerability assessment summary in the context of analyzing drought conditions as a climate hazard. It is concerning that there is not a strong tie between the drinking water utility services and its dependence on groundwater, especially given statewide extreme drought conditions and the challenges the Woodland-Davis Clean Water Agency (WDCWA) face when securing additional water rights for surface water. As of 2021, the City of Davis relied on groundwater to deliver 36% of its water demand. The sustainability of groundwater is a challenge at a regional and state level, and climate change poses a direct threat to the integrity of the groundwater basin. Groundwater in California continues to be a diminishing resource that is vulnerable to contamination from agriculture and commercial activities. The UC CAAP Subcommittee recommends that the City revise the draft CAAP to assess the vulnerabilities of the City’s groundwater and revise the priority actions that intersect with drinking water to include substantive measures that address the City’s groundwater supply. Any vulnerabilities and associated actions should be aligned and integrated with the City’s involvement in the Yolo Subbasin Groundwater Agency and its Groundwater Sustainability Plan (2022).

4. Utility Rate Setting

One of the major responsibilities of the UC is to recommend rate setting principles and reserve policies for Davis utilities (i.e. drinking water, wastewater, and solid waste). In addition, the UC is charged with evaluating and comparing options to improve utility service and/or change the scope and methods of service delivery, as well as the social and economic equity effects of utility service and rate options on different segments of the Davis community. The UC CAAP Subcommittee feels the need to reiterate how utility rate impacts disproportionately impact renters and low-income. Based on the 2020 Census data, the City of Davis is 55.3% renter occupied compared to 38.3% renter occupancy in the Sacramento-Roseville region and 44.7% statewide. Renters do not have the same agency or voice when utility rates are voted on or adopted as homeowners or landlords.

In Chapter 5 and Appendix B (Funding and Finance) the draft CAAP is missing the necessary level of detail on how each of its 28 priority actions will be financed. The UC CAAP Subcommittee is concerned by the ambiguity that is presented in Appendix B, Table 4, *Revenue-Generating Mechanisms* with respect to "Utility Fees, including Stormwater Fees." The UC CAAP Subcommittee strongly recommends for the CAAP Team to build in the timelines and address the nuances for renewing a utility rate study and/or undertaking a Proposition 218 initiative (Right to Vote on Taxes) if additional revenue from City operated utilities are required to meet any CAAP priority actions. Current utility rates and rate studies have not included the priority actions or additional actions for consideration from the CAAP. These processes can take extensive time to complete and are not always a guaranteed outcome, particularly for a Proposition 218 ballot. In addition to the utility rate study and Proposition 218 initiative (if applicable) pathways to utility rate increases, the UC CAAP Subcommittee recommends that the City explore other financing pathways, such as short term interfund loans or utility bond measures, to finance the CAAP actions.

Lastly, the UC CAAP Subcommittee identified that the sustainability leadership model within the city will not be reviewed by the public prior to adoption of the CAAP by City Council. Given that, the UC CAAP Subcommittee urges the CAAP Team to include a more detailed pathway to implementation and accountability mechanisms to ensure overall success of the CAAP.

On October 19th, 2022, the Utilities Commission voted to approve the recommendations provided in this report and to forward it to the CAAP Team and City Council.

Respectfully,

UC CAAP Subcommittee

Appendix A: CAAP Actions with Utility Impacts

Utility Topic	CAAP Section	Action	Goal	Quote	UC CAAP Subcommittee Response
VCE	Chapter 4.2.1	Action A.5. Community solar energy	Goal: Transition to High Efficiency, Zero Carbon Homes and Buildings	Partner with Valley Clean Energy (VCE) to increase capacity in support of citywide building and transportation electrification, investments in community solar energy, and provide solar battery storage. Encourage all subscribers to enroll in the UltraGreen option. Develop financing/incentive options to support building and transportation energy electrification and energy efficiency improvements.	Concur.
VCE	Chapter 4.2.1	Action A.7. Renewable energy in City facilities	Goal: Transition to High Efficiency, Zero Carbon Homes and Buildings	Switch from fossil gas to electricity, renewable hydrogen, or other non-fossil renewables in all existing City facilities, and include a provision that the City shall upgrade to UltraGreen (100% renewable energy) with Valley Clean Energy for all municipal accounts.	Concur.
Microgrids/Resiliency	Chapter 4.2.2	Action A.8. Create community microgrids and resiliency hubs	Goal: Expand Local Renewable Energy Development and Storage	Address and incentivize the creation of community microgrids, community battery "co-ops", and the networking of local energy sources. Create and/or support resiliency hubs that remain in operation during a power grid outage.	Concur.

Stormwater	Chapter 4.2.4	Action B.5. Pedestrian and bicycle safety	Goal: Increase Opportunities for Active Mobility in the Community	Encourage active transportation with infrastructure improvements. Implement roadway and bikeway infrastructure improvements in existing right-of-way, such as "road diets," narrower pedestrian crossing distances, green stormwater infrastructure, etc., to meet Green Streets standards and increase safety for pedestrians and bicycles.	Concur.
Stormwater	Chapter 4.2.8	Action C.1. Climate-ready private landscapes	Goal: Conserve Water in Our Buildings and Landscapes	Develop financing/incentive options with specific provisions for low-income and vulnerable populations that promote climate-ready private landscapes, such as installing drought tolerant, native, climate-ready plants and/or xeriscaping; programs that support turf removal; installing rainwater capture and harvesting equipment; and the use of green stormwater measures to enhance natural water infiltration.	Need to address inequities between homeowners and renters. Financial impacts to stormwater utility is not characterized.
Stormwater	Chapter 4.2.9	Action D.1 Cool Surfaces	Goal: Create a Cooler City with More Urban Forest and Green Space for People and Habitat	Trees in parks and greenbelts enhance recreation spaces and offer habitat for wildlife. Trees also help to manage stormwater runoff flows, improve property values and have been shown to reduce stress and improve moods.	Concur.
Stormwater	Chapter 4.2.11	Action D.3. Green stormwater infrastructure	Goal: Protect Public Health, Safety, and Infrastructure	Develop policies to increase the use of green stormwater infrastructure and enhance natural water infiltration in public	Need to address inequities between homeowners and renters. Financial impacts to

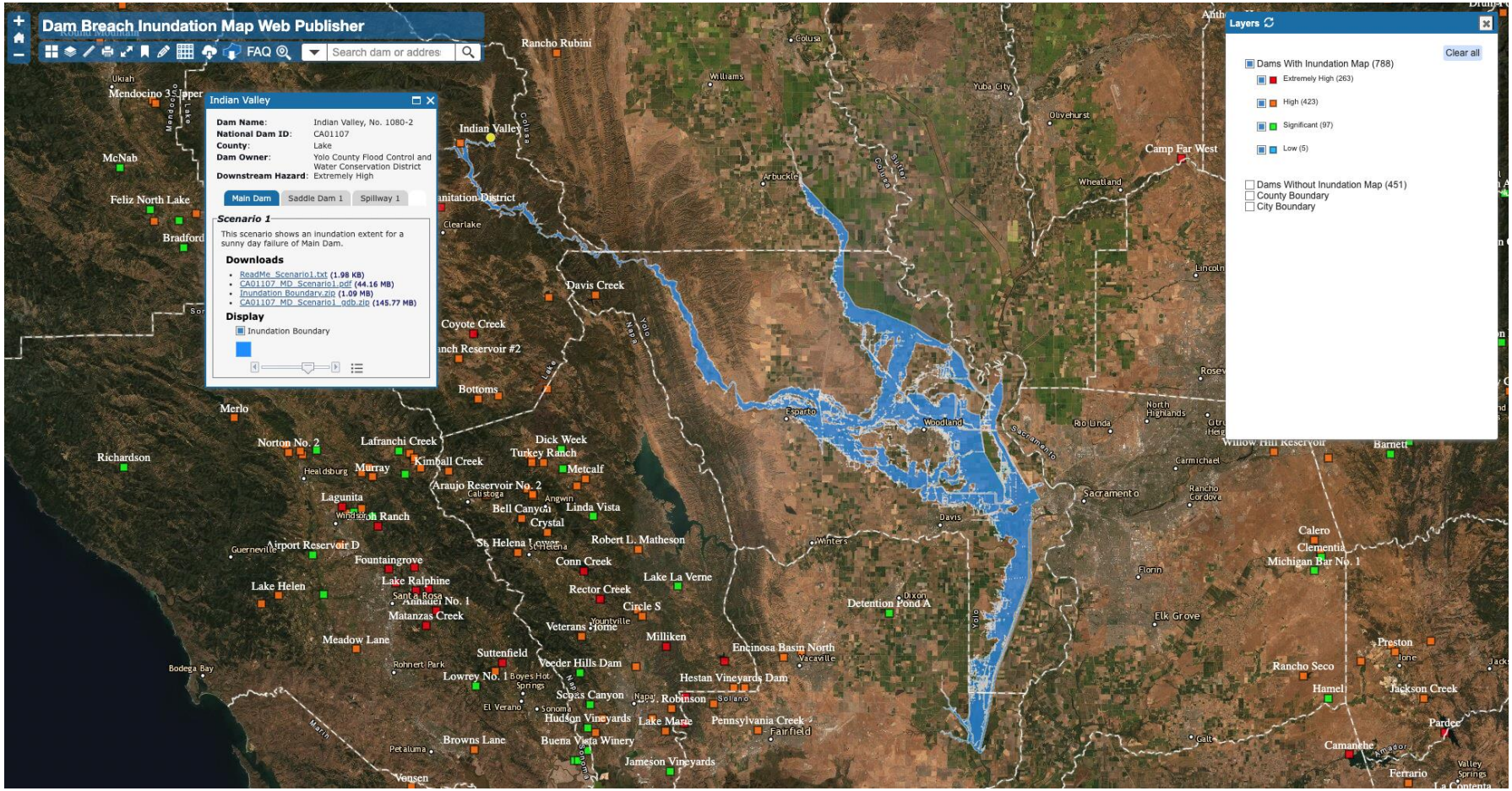
			Against Damage and Disruption from Flooding	infrastructure	stormwater utility are not characterized.
Stormwater, Wastewater, and Drinking Water	Chapter 4.2.11	Action D.4. Flood resilience of critical infrastructure	Goal: Protect Public Health, Safety, and Infrastructure Against Damage and Disruption from Flooding	Relocate/elevate critical public infrastructure out of projected flood areas. The Vulnerability Assessment identified that critical infrastructure lies within the 100-year floodplain and is vulnerable to flooding, including Sutter Davis Hospital, potable water wells, all five of the City's stormwater pump stations, approximately one mile of Highway 113 and more than 13 miles of City streets.	Analysis of climate hazards and impacts is not holistic. Refer to UC CAAP Subcommittee Report for the October 19, 2022 meeting.
Stormwater	Chapter 4.2.12	Action D.5. Funding and staffing for existing efforts	Goal: Prepare and Respond to Climate Hazards to Ensure that the City is Equipped to Address Current and Future Challenges	Allocate funding and staff resources to aggressively implement important existing climate-related programs, policies and management, such as City utility infrastructure (water, wastewater and stormwater) and assets (trees, streets, etc.) Continue to conduct assessments at regular intervals to ensure efficient and effective operations that are at pace with industry improvements, and changing needs due to climate change impacts, and implement recommendations in the assessments as technologically and financially feasible.	Financing and impacts on utility rate setting is absent in the CAAP. Concerns regarding integration of programs, plans, and documents related to climate change are documented in the UC CAAP Subcommittee Report for the October 19, 2022 meeting.

Solid Waste	Chapter 4.2.12	Action D.5. Funding and staffing for existing efforts	Goal: Prepare and Respond to Climate Hazards to Ensure that the City is Equipped to Address Current and Future Challenges	The City has created several climate-related plans, policies and programs to address crucial needs for climate adaptation and mitigation. However, a lack of funding and staff resources has slowed implementation efforts. The plan, policies and programs cover multiple topics, including water management and conservation, urban forestry and solid waste reduction programs.	Need to address the funding for utility services and programs that will be impacted. In addition, there is a need to integrate documents and plans with a technology based solution, "IBM Doors" is an industry standard tool for this. Concerns regarding integration of programs, plans, and documents related to climate change are documented in the UC CAAP Subcommittee Report for the October 19, 2022 meeting.
Wastewater	Chapter 4.2.12	Action D.6. Public resources during extreme weather events	Additional Action Items for Consideration: Prepare and Respond to Climate Hazards to Ensure that the City is Equipped to Address Current and Future Challenges	ASR: Investigate aquifer storage and recovery (ASR) systems to capture and store excess river water for later use. Investigate the potential for augmenting aquifer storage with treated wastewater	Concur.
VCE	Chapter 4.2.3	Additional Action Items for Consideration: Adopt Zero Emissions Vehicles and Equipment to Reduce Fossil Fuel Use	Goal: Adopt Zero Emissions Vehicles and Equipment to Reduce Fossil Fuel Use	EV charging rates: Work with VCE to establish preferential electric vehicle charging rates to avoid disincentives to electric vehicle adoption (note: this action may not be feasible)	Concur.
VCE	Chapter 4.2.2	Additional Action Items for Consideration: Expand Local	Goal: Expand Local Renewable Energy Development and	Community solar: Set up sites for community solar complexes, with preference for participation from low-	Concur.

		Renewable Energy Development and Storage	Storage	income residents. Use VCE to organize these projects and deliver power to customers at fixed long-term prices	
VCE	Chapter 4.2.2	Additional Action Items for Consideration: Expand Local Renewable Energy Development and Storage	Goal: Expand Local Renewable Energy Development and Storage	VCE energy portfolio: Work with VCE to achieve a zero-carbon portfolio by 2030	Concur.
Stormwater	Chapter 4.2.11	Additional Action Items for Consideration: Protect Public Health, Safety, and Infrastructure Against Damage and Disruption from Flooding	Goal: Protect Public Health, Safety, and Infrastructure Against Damage and Disruption from Flooding	Grant funding for infrastructure: Pursue grant funding to support green infrastructure projects like urban forest management/expansion and sustainable stormwater management	Why does the City not explore other funding sources such as bond measures for utility infrastructure?
Wastewater	Chapter 4.2.12	Additional Action Items for Consideration: Protect Public Health, Safety, and Infrastructure Against Damage and Disruption from Flooding	Goal: Protect Public Health, Safety, and Infrastructure Against Damage and Disruption from Flooding	WWTP levee: Conduct analysis to determine if the levee surrounding the wastewater treatment plant would be accepted by the Federal Emergency Management Agency for flood protection from a 500-year storm event	Analysis of climate hazards and impacts is not holistic. Refer to UC CAAP Subcommittee Report for the October 19, 2022 meeting.

Appendix B: Dam Inundation Zones

As required by California Water Code section 6161, the Department of Water Resources (DWR), Division of Safety of Dams (DSOD) reviews and approves inundation maps prepared by licensed civil engineers and submitted by dam owners for extremely high, high, and significant hazard dams and their critical appurtenant structures.



Dam inundation zone for the Indian Valley Reservoir (High-Risk).

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MISSION

To inspire our community to reduce greenhouse gas emissions, adapt to a changing climate, and improve the quality of life for all.

October 10, 2022

Mayor Frerichs, Vice Mayor Arnold and Councilmembers Carson, Chapman and Partida
City of Davis
23 Russell Blvd,
Davis, CA 95616

Dear Mayor Frerichs, Vice Mayor Arnold, Councilmembers Carson, Chapman and Partida,

We applaud the City for undertaking the difficult but essential task of charting the city's course toward achieving carbon neutrality by 2040. Members of the Board of Directors of Cool Davis have reviewed the draft City of Davis 2020-2040 Climate Action and Adaptation Plan (CAAP) draft and the Board has voted to submit the following comments. We hope that these comments help to further strengthen the CAAP draft and help bring additional clarity to many of the community's and our questions.

Since 2010, the Cool Davis board, staff, and volunteers have been passionate about sharing smart energy and climate action "cool solutions" through our various community-based programs and activities. We understand that immediate action is necessary to significantly reduce our GHG emissions. We recognize the complexities of what the CAAP is trying to accomplish and applaud the City for being bold in this time of emergency. Cool Davis continues to be a willing partner in and supporter of the many action items referenced in this draft CAAP, especially those affecting household transformation.

With this in mind, Cool Davis sees many areas where the document needs adjustment to clarify the City's response to this emergency. Below we present a number of overarching comments for the CAAP draft document, followed by more detailed comments and recommendations on specific sections and appendices.

General Recommendations

Cohesive vision. Cool Davis recommends a clearer, more cohesive vision throughout the Climate Action and Adaptation Plan. As the City considers an impressive menu of interconnected actions, developing and articulating a shared vision for a net zero carbon future will improve the chances of achieving that vision.

Cool Davis recommends reorganizing the introductory sections (Ch 1, 2 & 3) to present a bold future oriented, positive, and honest vision that responds to the urgency of the moment. We suggest that the vision be restructured to present climate impacts, vulnerabilities, and the difficult but important goal statements up front.

Cool Davis also recommends that the plan and vision emphasize front and center that we are at an important transition point, that this is hard. The plan only sets the initial trajectory towards the 2040 goals, which is appropriate: things are evolving rapidly and the available resources and impending challenges seem to change every day. However, the .

introductory sections should also acknowledge that additional measures may be developed in the future, and that the City is firm in its commitment to working with the community to achieve carbon neutrality by 2040.

Restructuring and simplification. Cool Davis supports the restructuring and simplification of Chapter 4 Climate Actions and Appendix A. Implementation Road Maps. Based on NRC discussions, the City has already committed to making major changes to how the Chapter 4 Climate Actions and Appendix A Implementation Road Maps are presented. Cool Davis applauds this change and has some further recommendations we hope you will consider.

Cool Davis recommends creating a simpler view of the scope and goals for each Climate Action, and clarifying which metrics could be used to measure progress over time. Listening to community conversations, Cool Davis is hearing lots of confusion about how these actions relate to them, how they were identified, how they will be measured in the future, and how much work is needed to complete them.

Our specific suggestions include:

- **Prioritize Near-Term Actions** - Cool Davis would like this plan to more clearly identify the prioritized early next steps overall after the CAAP is approved. The City has taken significant steps to reduce 100 actions to 28 but what can the community expect to happen right after the CAAP is approved?
- **Enhance the Vision of Each Action** - Cool Davis recommends adding a clearer and simplified vision statement for each action at the start of each introduction to capture its scope and intent (one model is the City of Oakland's ECAP pps 36-38)
- **Improve Data Clarity throughout the Plan** - To make it easier for the public to understand the magnitude and impact of each action within the CAAP, Cool Davis recommends refreshing all graphs that use GHG data. We recommend that the CAAP include a set of simple graphs, creating a clear GHG story, in one location (likely within Chapters 1, 2 & 3), to compare existing GHG conditions and to clearly communicate the 2030 and 2040 forecasted GHG reduction targets. The introductory GHG graphics can provide a framework for all actions. It would help if each action's metrics and GHG impact could be easily related back to these original introductory graphics. Cool Davis also recommends that the CAAP clearly explain how the existing data are being used to identify these actions, any existing data limitations, and what plans the City has for future GHG baseline data collection.
- **Better Define Each Action's Baseline Scope, Effort, Impact, and Progress** - Cool Davis recommends restructuring each action to highlight baseline scope of effort, what will be impacted, and how much progress has been made to date.
- **Improve Action Measuring Metrics** - Cool Davis recommends developing a set of simple and measurable metrics to help the City measure progress and help the community better understand progress for each action.
- **Revisit Action Staffing Needs** - Cool Davis recommends revisiting the staffing needs section and use that space to be aggressive and proactive with resource needs to meet the requirements of each action. Cool Davis recognizes that the City has limited resources and staff and that the CAAP will require a large amount of additional effort across the City departments. To this end, Cool Davis suggests the City be open about these limitations and identify and ask for the necessary resources now.

- **Add Estimated Cost of Each Action** - Cool Davis recommends providing estimated costs for each action and simplifying the financial information with visuals or graphs so the community can clearly see the relative amount of funding needed and which types of funding mechanisms might apply to each action. Cool Davis also recommends removing co-benefits from the financial table (Appendix B), as they are already mentioned in each action.
- **Stronger Equity Focus for Each Action** - Cool Davis recommends that equity considerations be addressed front and center:
    - Address equity issues for low income and vulnerable communities in milestones.
    - How will/should rental properties and residents be considered within each action?
    - How will the City assist lower income residents (either homeowners or renters) who will directly or indirectly carry the burden of the cost of required improvements?
    - How will the City ensure all residents can participate in benefits?

New sections. Cool Davis recommends adding new sections to Chapter 5 Implementation and Monitoring Framework related to staffing, community oversight, community partnership and engagement . Expanding the implementation and monitoring section of Chapter 5 will allow the City to add more details related to how it will handle future staff resources, engage in community oversight, and facilitate community engagement during implementation. Cool Davis also recommends strengthening section 5.6 relating to vulnerability and resilience. Chapter 5 can set the stage for the key content in each roadmap and action. Cool Davis specifically recommends the following additions to Chapter 5:

- **Develop a Staffing Section** - Cool Davis recommends providing an overarching staffing section that details how CAAP actions will be managed and implemented. Cool Davis suggests that the City invest in an experienced and credentialed Manager / Director and at least two more staff initially. We recommend that these staff be given the authority to direct City CAAP actions and to work both within the City and externally to coordinate the implementation of each action.
- **Develop a Community Oversight Section** - Cool Davis recommends that the City create a more formal climate action commission structure with the authority and responsibility to work together with community stakeholders to create detailed action implementation plans and monitor their progress.
- **Develop a Community Partnership and Engagement Section** - Cool Davis recommends adding a community partnership and engagement section to highlight how the City will collaborate with community partners like Cool Davis, Tree Davis, Bike Davis, The Bike Campaign, and UC Davis, as well as organizations that represent stakeholders such as realtors and property managers. Such steps will be essential for effective plan implementation. It is imperative that the City develop strong and effective processes for working together with its partners to build resilient neighborhoods and implement CAAP goals and programs at the neighborhood and household level.
- **Improve Adaptation Actions and Vulnerability Assessment Connection :** Cool Davis recommends that section 5.6 of the CAAP highlight how planned actions will respond to key vulnerabilities to strengthen community systems, structures, households and neighborhoods in anticipation of growing climate impacts. Recent events with electrical power outages during a dangerous heat wave in our community, highlighted some of these vulnerabilities, and showed how our physical and social systems are not fully prepared at the neighborhood and community level.

  The vulnerability analysis in Appendix C remains weak due to its lack of specificity and detailed focus on actual Davis assets, community systems, and neighborhoods. Cool Davis recommends

providing a framework in an updated assessment soon, that expands on actions to protect against predicted impacts and ensure neighborhood and community wide resilience. We need better answers to questions such as these:

- What is the state of our stormwater system, electricity delivery system, water system, emergency shelter system, public health system, building safety, and social safety net, neighborhood by neighborhood?
- What do we need to strengthen these, how and when and with what funding are we going to strengthen them?
- Where do our vulnerable populations live and how will we address their vulnerabilities in a systematic way?

Changes to Specific Actions

Building Energy: Cool Davis is supportive of actions that directly promote electrification, including the creation of home- and neighborhood-based integrated electric systems with backup power including microgrids and vehicle-to-grid power management.

- Actions A1, A3 & A4 fit well with Cool Davis's current experience with household retrofit. We believe that a majority of building electrification needed can be implemented through these actions. These requirements should be put in place as quickly as possible so that building owners can take advantage of the coming federal and state rebate programs. Actions A2 and A3 rely on the effectiveness of Action A1, and Cool Davis strongly recommends that A1 be a high priority for the City.
- Many of the A1-A8 Actions would result in costs to property owners and/or the community. Cool Davis suggests that guidance be developed that explains the costs, co-benefits (especially cost savings from operation), and availability of grants, funding, and rebates to support the replacement of key appliances or conducting an upgrade or opting up to Ultra Green. We suggest the City try to make the case that they are financially feasible over time.
- Regarding Action A2, Cool Davis staff were present at the conversation with the local real estate community and building owners. We support the City in continuing to work closely with such stakeholders to find feasible, constructive solutions. Although the intent of Action A2 appeared to be to allow for flexibility and accommodate unique building situations, it has been interpreted as excessively burdensome by the community. Cool Davis recommends clarifying A2 so that it includes a mix of supportive measures (e.g., financial assistance, financing, incentives, education, outreach, planning assistance, or a Home Energy Score) and mandatory measures (e.g., a time-of-sale or other ordinance for the small number of natural gas appliances that do not naturally turn over through attrition over the next 17 years). We recommend the City makes it clear that plan to continue constructive engagement with the real estate and housing communities to make a detailed implementation plan that will work for Davis.
- Action A3, energy efficiency and ventilation in rental properties, implies air conditioning will be added where it is not currently installed. Such a change would occur by default if gas space heating is to be replaced by electric heat pumps, which combine both heating and cooling functions. It should be more clearly stated that while adding space cooling to properties that do not currently have cooling will add to energy use, it is an equity issue that will also provide improved comfort and potentially save lives with summer temperatures increasing into the future. Kitchen ventilation could be included in this measure. Cooking is the largest source of indoor air pollution and existing kitchen ventilation is inadequate in many cases.

- Action A.5, community solar energy, could be improved by creating a program that enrolls all eligible low-income utility customers in UltraGreen (100% renewable) at no additional cost.

Transportation: The Cool Davis Boards makes the following recommendations:

- In the presentation of Actions B3-B10 in the Action section and in the roadmaps, there remains a disconnect between GHG emissions from specific activities (like commuting to jobs outside of Davis and UC Davis) and the actions that are offered as solutions. The result is many questions about the usefulness or value of specific actions in terms of GHG reduction to the specific activity or problem. Cool Davis recommends, in keeping with our overall comments above, that the GHG relationship be more clear between emitting activities and actions that will address those emissions..
- There are many actions hidden or assumed within B1, B2, B4, B5, B7, B9, and B10, many of which overlap each other. Each of these sub actions requires more analytics to decipher its GHG reduction value, a more complete explanation of how it will work, prioritization (which comes first), and a roadmap for implementation. Therefore, Cool Davis recommends a clarification at the front of the Transportation section that recognizes the need for more detailed analysis and clarifies steps that will be taken immediately when the plan is approved.

Land Use: The Cool Davis Boards makes the following recommendations:

- Regarding Action B11, the GHG analysis of land use shows that households living in denser environments generate less GHG per capita because of reduced transportation GHG. It also reveals that lower income households generate less overall GHG because they are not consuming as many resources per capita. Cool Davis recommends that the City only support new housing focused on meeting the needs of lower- and moderate-income households with workforce housing to bring our community into better balance both in income and GHG emissions.

Climate Resilience: The Cool Davis Board makes the following recommendation.

- The Actions covered in C1 to D6 are mostly plans-to-plan, to complete assessment and plan for these vulnerabilities and impacts. This could be stated more clearly in the document. How will these more detailed, future plans be prioritized, funded, and staffed to achieve the strengthening and preparedness that is needed?

Summary

Cool Davis applauds the City for developing a new Climate Action and Adaptation Plan. Many communities have not taken such proactive steps, and we are pleased to be a part of a community that is taking the threat of climate change seriously by making concrete plans to mitigate impacts and ease adaptation. The goal of net zero carbon emissions by 2040 is quite ambitious, but it is necessary to ensure we leave a livable community for our children and grandchildren. While it is difficult to imagine what a net zero carbon Davis will look like in 2040, we agree that it is possible to achieve – with strong leadership and a community engaged around a common vision. We look forward to continuing to work with you to make our shared vision a reality.

Cool Davis is happy to engage with the City as appropriate to clarify or expand on these comments.

Sincerely on the Behalf of the Cool Davis Board of Directors,

Jason Bone
Cool Davis Board President

Christine L Granger
Executive Director

Cc:

Mike Webb, Davis City Manager
Diana Jensen, Acting Director of Public Works Engineering & Transportation, CAAP Project Director
Kerry Daane Loux, Sustainability Coordinator, CAAP Project Manager
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