

“C”

Project Application for Land Use Action
Review Permit Application Packet



PROJECT APPLICATION FOR LAND USE ACTION REVIEW

Project Identification No.

PROJECT PROPONENT (TO BE COMPLETED BY APPLICANT)

Date of Application 12/5/2025
 Applicant City of Napa Phone Number 707-257-9460
 Mailing Address PO Box 660, Napa, CA 94559

Agent (if any) RCH Group Phone Number 916-782-4427
 Mailing Address PO Box 516, Rancho Murieta, CA 95683

PROJECT LOCATION (TO BE COMPLETED BY APPLICANT)

Attach an accurately scaled map showing the relationship of the project site to the airport boundary and runways

Street Address 820 Levitin Way
 Assessor's Parcel No. 057-090-087 Parcel Size 2.87 acres
 Subdivision Name _____ Zoning Classification Industrial
 Lot Number _____

PROJECT DESCRIPTION (TO BE COMPLETED BY APPLICANT)

If applicable, attach a detailed site plan showing ground elevations, the location of structures, open spaces and water bodies, and the heights of structures and trees; include additional project description data as needed

Existing Land Use Vacant Land Industrial
 (describe) _____

Proposed Land Use Biomass Conversion Facility - 1.5 MW using wood to generate renewable electricity.
 (describe) _____

For Residential Uses Number of Parcels or Units on Site (exclude secondary units) _____
 For Other Land Uses Hours of Use 24 hours per day
 Number of People Maximum Number 3
 On Site... Method of Calculation Based on Syncraft's existing facilities

Height Data Height above Ground of Tallest Object (including antennas and trees) 45 ft.
 Highest Elevation (above sea level) of Any Object or Terrain on Site 94 ft.

Flight Hazards Does the Project Involve Characteristics that:

- Could Create Electrical Interference, Confusing Lights, Glare, Smoke, or Other Electrical or Visual Hazards to Aircraft Flight? Yes No
- Could Attract Birds or Other Wildlife to the Airport or Vicinity? Yes No

If Yes, Describe The EIR describes how these potential impacts are less than significant following CalTrans and FAA Guidance.

REFERRING AGENCY (TO BE COMPLETED BY SUBMITTING AGENCY STAFF)

Date Received	<u>12/5/2025</u>	Type of Project
Agency Name	<u>City of Napa</u> <u>Utilities Department</u>	<input type="checkbox"/> General Plan Amendment
Staff Contact	<u>Chris Jones</u>	<input type="checkbox"/> Zoning Amendment or Variance
Phone Number	_____	<input type="checkbox"/> Subdivision Approval
Agency's Project No.	<u>C2023-147</u>	<input checked="" type="checkbox"/> Use Permit
		<input type="checkbox"/> Public Facility
		<input type="checkbox"/> Other _____

Inter-Agency Coordination: Indicate neighboring agencies that have been notified of project.

City of Napa City of American Canyon County of Napa Other _____

ALUC REVIEW (TO BE COMPLETED BY ALUC STAFF / ATTACH ADDITIONAL PAGES IF NECESSARY)

Application Date Received _____ By _____

Receipt Is Application Complete? Yes No

If no, cite reasons _____

Airport Napa County Airport Angwin Airport – Parrett Field

Land Use Category/Categories _____

Compatibility Zones	Angwin Airport – Parrett Field	<input type="checkbox"/> A	<input type="checkbox"/> B	-	-	<input type="checkbox"/> C	<input type="checkbox"/> D1	<input type="checkbox"/> D2	<input type="checkbox"/> E
	Napa County Airport	<input type="checkbox"/> A	<input type="checkbox"/> B1	<input type="checkbox"/> B2	<input type="checkbox"/> B3	<input type="checkbox"/> C	<input type="checkbox"/> D1	<input type="checkbox"/> D2	<input type="checkbox"/> E
	Land Use Acceptability	<input type="checkbox"/> Normally Compatible		<input type="checkbox"/> Conditional		<input type="checkbox"/> Incompatible			
	Sitewide Avg. Density/ Intensity Criteria Met?	<input type="checkbox"/> Yes	<input type="checkbox"/> No						
	Single-Acre Density/ Intensity Criteria Met?	<input type="checkbox"/> Yes	<input type="checkbox"/> No						
	Sound Attenuation Required?	<input type="checkbox"/> Yes	<input type="checkbox"/> No						
	Other Applicable Conditions Met?	<input type="checkbox"/> Yes	<input type="checkbox"/> No						

Airspace Protection Compatibility	Height Acceptable?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	FAA Notified if Applicable?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Other Hazards to Flight Excluded?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Other Requirements	Avigation Easement Required?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Recorded Overflight Notification Required?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Executed?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Special Site/Project Conditions	Infill Parcel?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Other (describe)	_____	

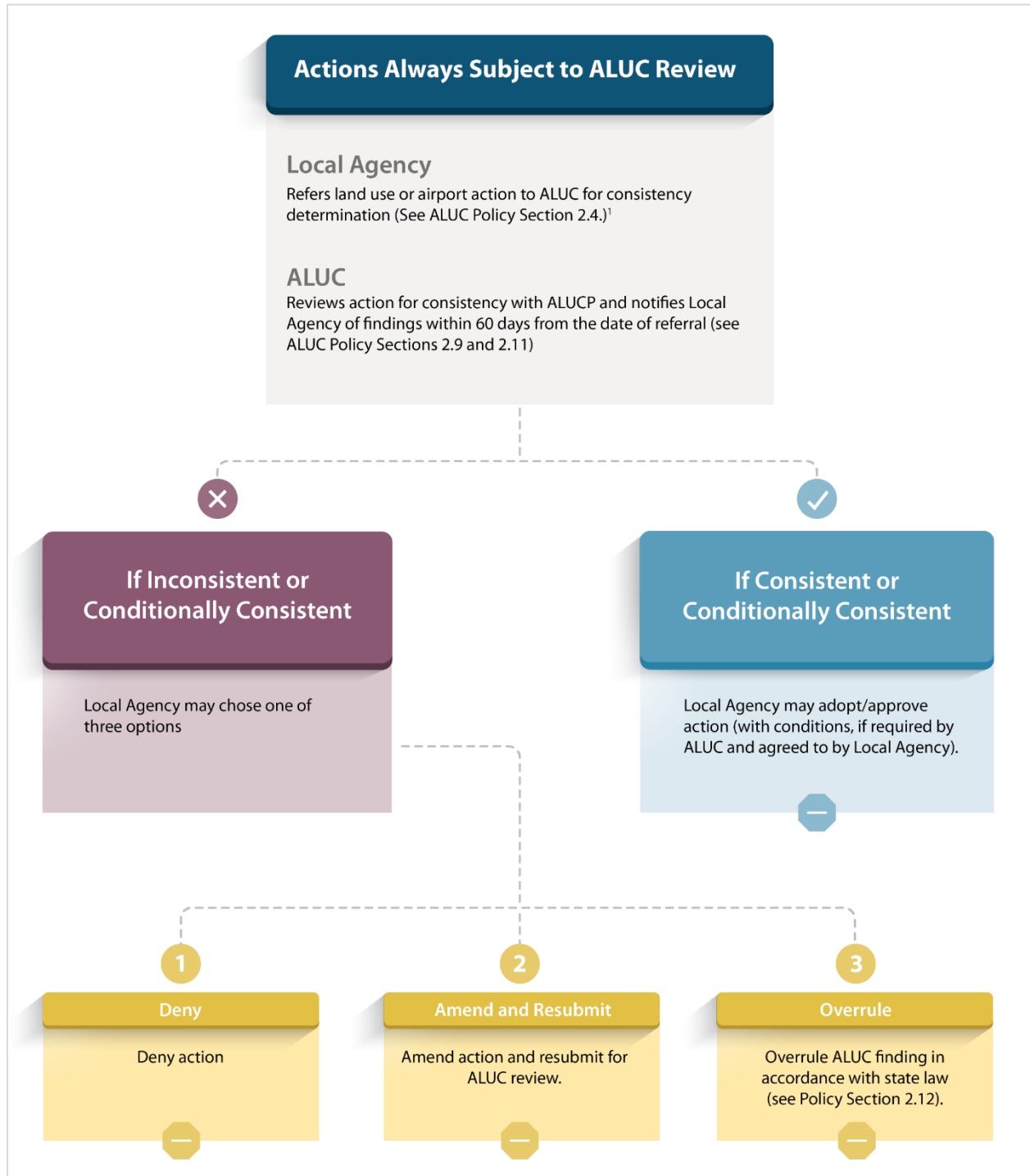
ACTIONS TAKEN (TO BE COMPLETED BY ALUC STAFF)

<i>ALUC Staff</i>	<input type="checkbox"/> Approve as Submitted	Date	_____
Action	<input type="checkbox"/> Refer to <i>ALUC</i> <input type="checkbox"/> Include Conditions?		
	Conditions:	_____ _____	

<i>ALUC</i>	<input type="checkbox"/> Consistent	Date	_____
Action	<input type="checkbox"/> Consistent with Conditions (list conditions / attach additional pages if needed)		_____ _____
	<input type="checkbox"/> Inconsistent (list reasons / attach additional pages if needed)		_____ _____

EXHIBIT F-1: ACTIONS ALWAYS SUBJECT TO ALUC REVIEW

See ALUC Policy Sections 2.4, 2.9, and 2.11.

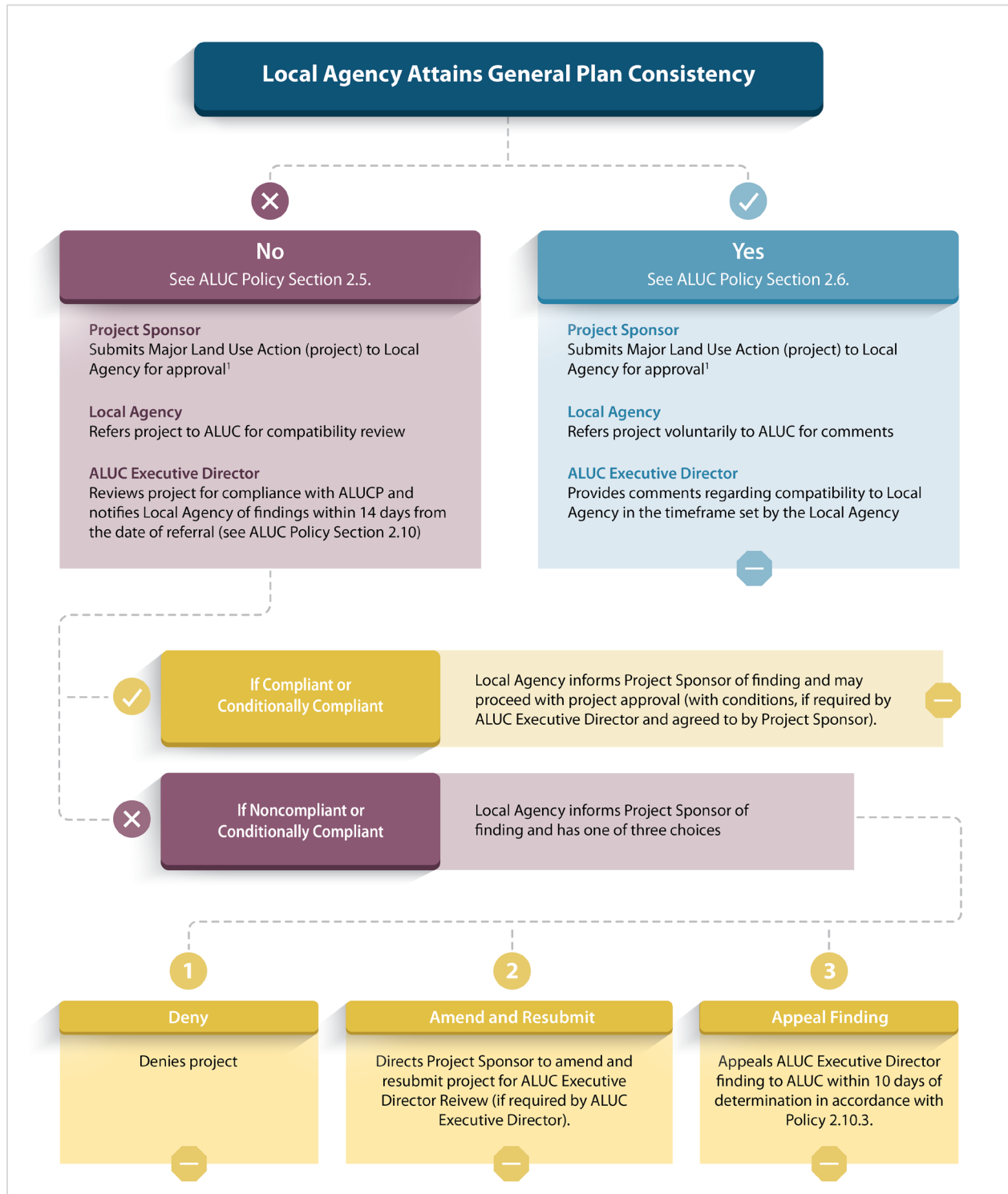


Notes:

1. Actions requiring mandatory referral to the Airport Land Use Commission (ALUC) include new or amended general plans, specific plans, facility master plans, airport master plans, zoning ordinances, rezoning of property, and building regulations, as well as Special Conditions Exceptions sought under Policy 3.2.4.
2. Source: Mead & Hunt, Inc. 2021

EXHIBIT F-2: MAJOR LAND USE ACTIONS SUBJECT TO ALUC REVIEW

See ALUC Policy Sections 2.5, 2.6, and 2.10.



Notes:

1. If project includes a proposed rezoning, it requires mandatory referral to the Airport Land Use Commission (ALUC) (see Exhibit F-1).
2. Source: Mead & Hunt, Inc. 2021



Utilities Department

April 6, 2026

Wendy Atkins
Planner II
County of Napa
1195 Third Street Suite 210
Napa, CA 94559

Dear Ms. Atkins,

The City of Napa is requesting a Special Condition Exception per Section 3.2.4 of the Napa Countywide Airport Land Use Compatibility Plan (ALUCP), adopted December 04, 2024, for the proposed Napa Renewable Resources Project (NRRP) 2.0. The NRRP 2.0 projects, including the proposed Biomass Conversion Facility (BCF), provide substantial benefits to the community. The proposed BCF site is located between similar existing facilities (the City of Napa's Material Diversion Facility (NMDF) and the Napa Vallejo Waste Management Authority's (NVWMA) Devlin Road Transfer Station). The following demonstrates that special conditions apply to the development of the proposed BCF.

Existing NMDF Site Constraints

The proposed BCF use is consistent with the surrounding land uses (NMDF to the north and Devlin Road Transfer Station to the south). The property south of NMDF proposed for development of the BCF was purchased from the NVWMA and could have been used to expand transfer station operations. The existing NMDF is constrained by existing operations and cannot support the development of a BCF on the existing site. A 1-megawatt (MW) BCF was approved in 2014 as part of the NRRP 1.0 project and associated California Environmental Quality Act (CEQA) Mitigated Negative Declaration. The City of Napa has been contemplating development of a BCF to the south of NMDF for several years and development is noted as a planned improvement in the City of Napa 2040 General Plan (page 4-18), as follows:

“Bio-Energy: Also known as “biomass gasification,” this planned technology improvement would take urban wood waste and the woody fraction of yard trimmings and convert them to a synthetic gas that in turn can produce renewable energy. Under so-called “BioMat” legislation (SB 1122), up to 3 megawatts (MW) of

bioenergy can be produced and sold back to the electrical grid at a floor price. The City is in the process of purchasing and ultimately developing a little over 3 acres of land to the south of the City's current Materials Diversion Facility (MDF) from the Napa-Vallejo Waste Management Authority for the BioEnergy project. This is necessary as the current footprint of the City's MDF does not have adequate space for the proposed 3 MW BioEnergy project. Beyond utilizing wood waste locally and providing a renewable energy source, the BioEnergy project would also produce a "Biochar" product from the solid ash that has value and agricultural benefits as a slow "time-release" source of nitrogen or possibly serve as a water filtration product for wastewater or drinking water systems."

Environmental Benefits

The Project would benefit the community environmentally by reducing greenhouse gas (GHG) emissions and reducing criteria air pollutant emissions from trucking. The proposed BCF supports local compliance with statewide mandates under Senate Bill (SB) 1383, supports local organic waste diversion goals, and aligns with California's climate and renewable energy objectives by reducing landfill-bound organic waste, reducing GHG emissions, and producing carbon-negative byproducts. The proposed BCF would:

- Divert wood waste from landfill disposal (roughly 16,000 tons per year); This reduces emissions from the wood breaking down within the landfill.
- Reduce truck traffic associated air quality and GHG emissions associated with trucking wood waste (eliminating approximately four truck shipments per day or roughly 1,500 truck shipments per year);
- Generate clean, renewable electricity to power NMDF operations and sell excess renewable energy to the grid (roughly 13,140 MW hours annually); and
- Produce biochar, a carbon-sequestering soil amendment that has agricultural benefits as a slow "time-release" source of nitrogen.

The overall NRRP 2.0 Project is one of the key pathways the City of Napa can reduce its GHG emissions. If the Project is implemented, GHG emissions would be reduced by 3,500 metric tons of carbon dioxide equivalents per year (See Table 3.6.2 of the Draft EIR) while generating clean renewable energy (electricity from the BCF and renewable natural gas from the proposed anaerobic digestion facility [ADF] on the existing NMDF site).

Hazards/Safety

Building Occupants

The BCF is an industrial facility with limited onsite employees (up to three employees at a given time). The overall building is not intended for building occupants but is intended to house feedstock and process equipment. BCF employees would primarily be at ground-level in control rooms and feedstock drying bunkers, or outside the building. The limited

number of employees make it less likely that an employee is inside the building and allow for faster egress from the building in the event of a potential aircraft crash.

As indicated in Chapter 3.2.4(b) of the ALUCP(*Special Conditions Exception*),” In considering such exceptions, the ALUC shall also take into account the need for special measures to reduce risks to building occupants in the event the building is struck by an aircraft. In general, the risks to building occupants can be reduced by making the potential for a crashing aircraft to intrude into the building less likely, enhancing the building’s fire control measures, and/or enabling faster egress from the building in the event of an aircraft crash.”

The proposed BCF includes several special measures as part of the project design, including but not limited to:

- Concrete walls separating wood chip storage/drying area from the gasification hall.
- Electrical and control rooms would have one hour minimum fire rated walls.
- A roof structure supported by structural steel with typical Z purlins and metal sheeting (currently proposed but not finalized design).
- Limited windows and no skylights.
- A minimum of two emergency exits per area.
- A sprinkler system enhanced by additional safety measures such as gas and flame detectors. These detectors trigger an alarm and the gasification process is immediately shut down and all gas is sent to emergency flares. There would also be an automated building exhaust system that would be triggered by these alarms for the building.

Birds

The BCF would not increase bird attraction to the project area compared to existing conditions because the woody feedstock does not attract birds. The FAA *Advisory Circular, Hazardous Wildlife Attractants on or Near Airports*, states that branches and woodchips generally do not attract wildlife that is hazardous to air travel.¹ Since the BCF uses woody feedstock only and such material is kept in biomass drying bunkers within the overall building, bird attraction is not an issue.

The proposed ADF on the NMDF site would not be considered an incompatible use as it would not increase such hazards because organics are processed “in-vessel” and would not increase bird attraction to the site. The ADF would reduce the amount of food waste being mixed in with the existing composting operations, reducing bird attractants.

In order to deter birds from the existing NMDF site and future expansion to the south, the City has authorized NRWS to purchase a long-range acoustic deterrent (LRAD) made by

¹ FAA, 2020. *Advisory Circular, Hazardous Wildlife Attractants on or near Airports*, February 21, 2020. https://www.faa.gov/documentLibrary/media/Advisory_Circular/150-5200-33C.pdf.

Genasys (model 500X-RE). The LRAD system may reduce the number of birds onsite, the opportunity for bird strikes on airplanes, and the potential for aircraft crashes. The LRAD is a mobile speaker that broadcasts loud noise and/or bird calls to deter birds from the site. For example, seagulls leave the site when hearing hawk calls (See **Attachment A** for more information on the LRAD). Genasys LRAD systems have been purchased as a bird deterrent by others to deter birds from entering restricted areas (See link - [Genasys Announces \\$1.0M LRAD-RT Order | Genasys](#)) and has been used by airports as a bird deterrent to prevent bird strikes (See link - [Singapore Changi Airport Orders Another Acoustic Bird-prevention System | Aviation International News](#)). The LRAD system would be manually operated by an operator utilizing a range of sounds and predator calls and deter birds away from the site.

Airspace Protection

The Project sponsor submitted FAA Form 7460 on June 3, 2025, and the FAA issued its Determination Letter on July 29, 2025. The FAA study evaluated the facility's structures, including their height and location, to determine if they posed a hazard to air navigation. The FAA concluded that the proposed structures do not exceed obstruction standards and do not present a hazard to air navigation. While no marking or lighting is required for aviation safety, the FAA recommended voluntary compliance with its guidelines. The FAA study also confirmed that the proposed BCF presented no risk to national security.

Conclusion

In conclusion, the proposed NRRP 2.0 Project qualifies for a Special Condition Exception under the Napa Countywide ALUCP due to unique site constraints, strong policy support, and substantial environmental benefits. The Project is consistent with surrounding industrial uses, was long planned in the City's General Plan, and cannot be accommodated within the existing NMDF footprint. Environmentally, it advances state and local climate goals for landfill diversion, truck trip reduction, renewable energy generation, and carbon sequestration. Safety considerations have been addressed, including limited on-site occupancy, special safety measures, in-vessel organics processing, bird deterrence measures, and confirmation from the FAA that the proposed BCF poses no hazard to air navigation. Collectively, these factors demonstrate that special conditions apply and that approval of the requested Special Condition Exception is justified.

Sincerely,



Chris Jones, PE
Senior Civil Engineer

Attachment A - Genasys LRAD Brochure



PRODUCT INFORMATION

500X-RE
(-BLK/-GRN/-GRY/-TAN)

LRAD-500X-RE remote electronics, long range communication system with dash mounted MP3 control module (available in either black, green, gray, or tan).

INCLUDED ACCESSORIES

Control Module	Remote MP3 control module with 2 to 16GB onboard storage memory
Record on the Fly Mic	Microphone with record and playback feature for immediate playback
MP3 Auxiliary Cable	Allows connection to any audio device with a headphone jack
USB Cable	USB cable for downloading files to the MP3 player
Normalizer Software	Audio Normalizer software for creating customized audio recordings on a PC
Soft Cover	Protective Soft Cover

OPTIONAL ACCESSORIES

Wireless Kit	Wireless operation of LRAD systems over ranges up to 300 meters, 35mm phone jack connects to a standard MP3 audio device (UHF, US only). Lightweight hypercardioid headset microphone is included
HD Action Camera	During LRAD operation, record High Definition, date/time stamped video and audio with this compact, rugged digital camera
Maxa Beam Kit	12 million candlepower in a lightweight, mounted searchlight, illuminates targets up to 3,500 meters away
Power Supply Module	External AC to DC power supply, 100-220VAC to 28VDC
Power Pack	Portable power pack with internal battery, charger, 24VDC, 21AH
Hitch Mount	Vehicle Mount - attaches to standard trailer hitch receiver (2in/5.08cm)
GPK Mount	Mounts to Objective Gunner Protection Kit (OGPK) for vehicle mounted operations
Shiprail Mount	Stainless steel rail mount
Hard Case	Watertight, dust proof, rugged enclosure for storage and transport
Medium Duty Tripod	Rugged lightweight tripod with optional hard transport and storage case

DIRECTIONALITY, POWER & RANGE

- › Powerful, intelligible voice communications up to 2,000 meters
- › Focused, directional broadcasts for targeted communication
- › Variable beam width for extended coverage
- › Safely communicate beyond standoff distances
- › Create instant acoustic standoff perimeter

FEATURES

- › Rugged, military tested construction
- › Low power requirements
- › All-weather use
- › Simple to operate – increased coverage with single operator
- › Safer alternative to non-lethal and kinetic measures
- › HD Camera (optional) – Quick connect/disconnect camera and mount for recording video and audio during LRAD operation. Includes 4GB micro SDHC for up to 210 minutes of date and time stamped recordings

MARKETS SERVED

- › Law Enforcement
- › Defense
- › Commercial Security
- › Critical Infrastructure Security
- › Maritime
- › Homeland Security
- › Fire Rescue & Incident Management
- › Port & Border Security
- › Emergency Warning
- › Mass Communication
- › Wildlife Preservation & Control

LRAD 500X-RE

Rugged, Long Range Communications

COMPACT, LONG RANGE COMMUNICATION SYSTEM

The LRAD 500X-RE is compact, lightweight and designed for applications ranging from fixed security installations to small/mid-sized vehicles and vessels. It can be easily transported to provide security and defense personnel a highly effective communication, hailing and warning capability.



The LRAD 500X-RE has been selected as the U.S. Navy and U.S. Army's AHD (acoustic hailing device) for small vessels and vehicles.

LRAD 500X-RE operators have the capability to issue clear, authoritative verbal commands, followed with powerful deterrent tones to modify behavior, enhance response capabilities and provide more time to scale the use of force if required.

The extended frequency range of the LRAD 500X-RE ensures voice commands will be clearly heard and understood.

ACOUSTIC PERFORMANCE

Maximum Peak Output	154dB SPL @ 1 meter, C-weighted
Maximum Continuous Output	149db SPL @ 1 meter, A-weighted
Sound Projection	+/- 15° @ 1kHz/-3dB
Communication Ranges	Maximum range up to 2,000 meters in ideal conditions. Operational range up to 650 meters over 88dB of background noise. Ranges based on continuous output.

ENVIRONMENTAL PERFORMANCE

Hot Operating Temperature	MIL-STD-810G, Method 501.5, Procedure II, Design type Hot, 60°C
Cold Operating Temperature	MIL-STD-810G, Method 502.5, Procedure II, Design type Basic Cold, -33°C
Hot Storage Temperature	MIL-STD-810G, Method 501.5, Procedure I, 70°C
Cold Storage Temperature	MIL-STD-810G, Method 502.5, Procedure I, -40°C
Operating Humidity	MIL-STD 810G, Method 507.5, Procedure II - Aggravated Cycle
Rain	MIL-STD-810G, Method 506.5, Procedure I, Blowing rain
Salt Fog	MIL-STD-810G, Method 509.5
Shipboard Vibration	MIL-STD-167-1A
Shipboard Shock	MIL-S-901D, Shipboard Shock, Class I, Shock grade B
Random Vibration	MIL-STD-810G, Method 514.6, Wheeled Vehicles
SRS Shock	MIL-STD-810G, Method 516.6, Procedure I, (Functional shock)

DESIGNED TO MEET MIL-STD-810G, MIL-STD-167-1A, MIL-S-901D.

MECHANICAL

Dimensions	25"W x 25"H x 12"D (63.5cm x 63.5cm x 30.5cm)
Weight	44 lbs. (19.96 kg) without accessories
Construction	Construction Molded cross-linked polyethylene, 6061 Aluminum, Optional Stainless Steel connectors

ELECTRICAL REQUIREMENTS¹

Power Consumption	Typical Power consumption 265 Watts (With tone) Normal power consumption 60 Watts (With voice content)
Power Input	12-28 VDC

¹ TYPICAL POWER WITH WARNING TONE. NORMAL POWER CONSUMPTION WITH VOICE CONTENT, SOUND PROJECTION IS WIDE AND VOICE BOOST IS OFF.

SAFETY²

MIL-STD-1474D

² DESIGNED TO MEET MIL-STD-1474D. STANDARD ESTABLISHES ACOUSTICAL NOISE LIMITS AND PRESCRIBES TESTING REQUIREMENTS AND MEASUREMENT TECHNIQUES FOR DETERMINING CONFORMANCE TO THE NOISE LIMITS SPECIFIED THEREIN.

ELECTROMAGNETIC COMPATIBILITY (EMC)³

FCC Part 15 class A radiated emissions

³ DESIGNED TO MEET REQUIREMENTS FOR THE CONTROL OF ELECTROMAGNETIC INTERFERENCE CHARACTERISTICS OF SUBSYSTEMS AND EQUIPMENT.



Genasys - The Leader in Protective Communications

Genasys Protective Communications Solutions have a diverse range of applications, including predictive simulation to anticipate and understand the potential impact of emerging crises; emergency warning and mass notification for public safety; critical event management for commercial enterprises and government agencies; de-escalation for defense and law enforcement; as well as automatic detection of real-time threats. For more information, visit genasys.com.

CHAPTER 2

PROJECT DESCRIPTION

2.1 INTRODUCTION

This chapter of the Environmental Impact Report (EIR) presents a description of the Project that includes the Project background and site history, Project location and existing site characteristics, and Project elements. This chapter also provides a statement of Project objectives, the intended uses of the EIR, a list of public agencies that are expected to use this EIR, and a list of approvals and permits that may be required to implement the Project.

2.2 BACKGROUND AND SITE HISTORY

The Napa Materials Diversion Facility (NMDF) site is an 18.6-acre fully permitted Solid Waste Facility located at 820 Levitin Way¹ and currently receives and processes all solid waste, compostable and recyclable materials generated within the City that are collected by the City's authorized operator Napa Recycling & Waste Services (NRWS). The NMDF site also receives, and processes materials delivered by haulers servicing surrounding jurisdictions (such as unincorporated Napa County) and by private (self-haul) customers. Current operations at the NMDF site include receiving, storing, processing, recycling, and composting waste materials from residential, commercial, and industrial sectors. The NMDF site operates under Solid Waste Facility Permit (SWFP) 28-AA-0030, which limits the facility to a maximum tonnage of 760 tons per day (tpd) and 386 waste hauling vehicles per day.

The proposed Napa Renewable Resources Project 2.0 (NRRP 2.0, the "Project") consists of an increase of the NMDF site's overall permitted tonnage for all waste types to a weekly average of 1,000 tpd with a daily peak of 1,500 tpd, the construction and operation of a biomass conversion facility (BCF), and the construction and operation of an anaerobic digestion facility (ADF) as part of an initiative to enhance sustainable waste management at the NMDF site. The proposed daily permitted tonnage increase is reflective of recent equipment upgrades at the NMDF site (e.g., organics shredder, trommel screens, optical sorters, sorting robots, etc.) that have improved processing efficiency and would provide accommodations for peak days that have higher tonnage of certain waste streams (e.g., dirt, rock, grape pomace, leaf fall season, etc.).

The NMDF site was developed in the early nineties to answer the call of the California Integrated Waste Management Act of 1989 (AB 939) to divert 50% of the waste stream from disposal by 2000, which has been surpassed. The City and the operator (NRWS) maintain many local and state permits for the NMDF site. The County of Napa approved Use Permit U-90-29, and

¹ Assessor Parcel Number (APN): 057-110-049, -052, -065, -066, -067, and -068.

certified a Negative Declaration (ND) in 1991, that has been modified several times over the years; February 9, 1994 (93248-MOD), September 16, 1994 (93530-MOD), April 16, 1995 (94129-MOD), March 20, 1996 (95172-MOD), and August 20, 1997 (96468-MOD), and with each Use Permit Modification, an ND was certified pursuant to the provisions of the California Environmental Quality Act (CEQA). All these approvals occurred prior to the City of Napa purchasing the NMDF site and are no longer valid for current NMDF operations on the six core parcels that make up the existing NMDF.

The City of Napa has been highly successful since purchasing the NMDF site in 2004. The current Napa Renewable Resources Project 1.0 (NRRP 1.0) at the NMDF site was approved in 2013 (Notice of Determination was filed in 2014) and through subsequent addenda. As a result of NRRP 1.0, a Conditional Use Permit (CUP) was issued by the City of Napa Planning Commission per Resolution PC-2013-15 (approved on November 7, 2013). This is the current CUP for the six core parcels owned by the City that make up the existing NMDF. Prior to the 2013 approval, a Mitigated Negative Declaration (MND) was prepared pursuant to the provisions of CEQA. The 2013 MND for NRRP 1.0 analyzed covered composting, a 20,000 tons per year (tpy) ADF, a 1.0-megawatt (MW) biomass gasification facility (BGF), installation of improved stormwater treatment facilities, and solar panels on the roof of the NMDF building and shop building. The 2013 MND also allowed food waste and co-collected food waste to be received at the facility, increased the permitted maximum storage of organics onsite at any one time from 60,00 cubic yards (cy) to 90,000 cy, and changed facility hours to 24-hour operations to operate the blowers for covered composting and the future ADF.

The six core parcels owned by the City that make up the existing NMDF were annexed into the City of Napa through Local Agency Formation Commission (LAFCO) of Napa County on March 4, 2014. These six parcels have since been legally merged into a single parcel and are awaiting a new APN number from Napa County.

In 2014, the First Technical Addendum (July 2, 2014) to the 2013 MND was approved, which increased the peak design capacity of the approved ADF from 20,000 to 25,000 tpy, clarified the feedstocks for composting, and institutionalized the historical product depackaging operations.

In 2016, a Second Technical Addendum (May 24, 2016) to the 2013 MND Addendum addressed an increased peak daily tonnage, a shift from the initial 500 tpd to 760 tpd. Furthermore, this addendum responded to specific inquiries from the Bay Area Air Quality Management District (BAAQMD), providing additional analysis for the electric sort line and organics processing equipment replacing diesel-powered machinery.

In 2017, a Third Technical Addendum (January 13, 2017) to the 2013 MND Addendum addressed an increased peak daily tonnage of organic materials to 760 tpd (the current facility tonnage limit for all waste types).

In 2018, noteworthy revisions continued through a Fourth Technical Addendum (March 5, 2018) to the 2013 MND, which analyzed a Covered Aerated Static Pile (CASP) mass bed composting system with concrete slab, walls, and positive aeration system capable of composting 66,640 tpy, the modification of drainage pipelines to direct all stormwater on-site to a single detention pond

capable of processing 1,000 gallons per minute, the installation of roof structures that cover operations, and adjusting the peak design capacity of the approved ADF from 25,000 tpy to 44,000 tpy.

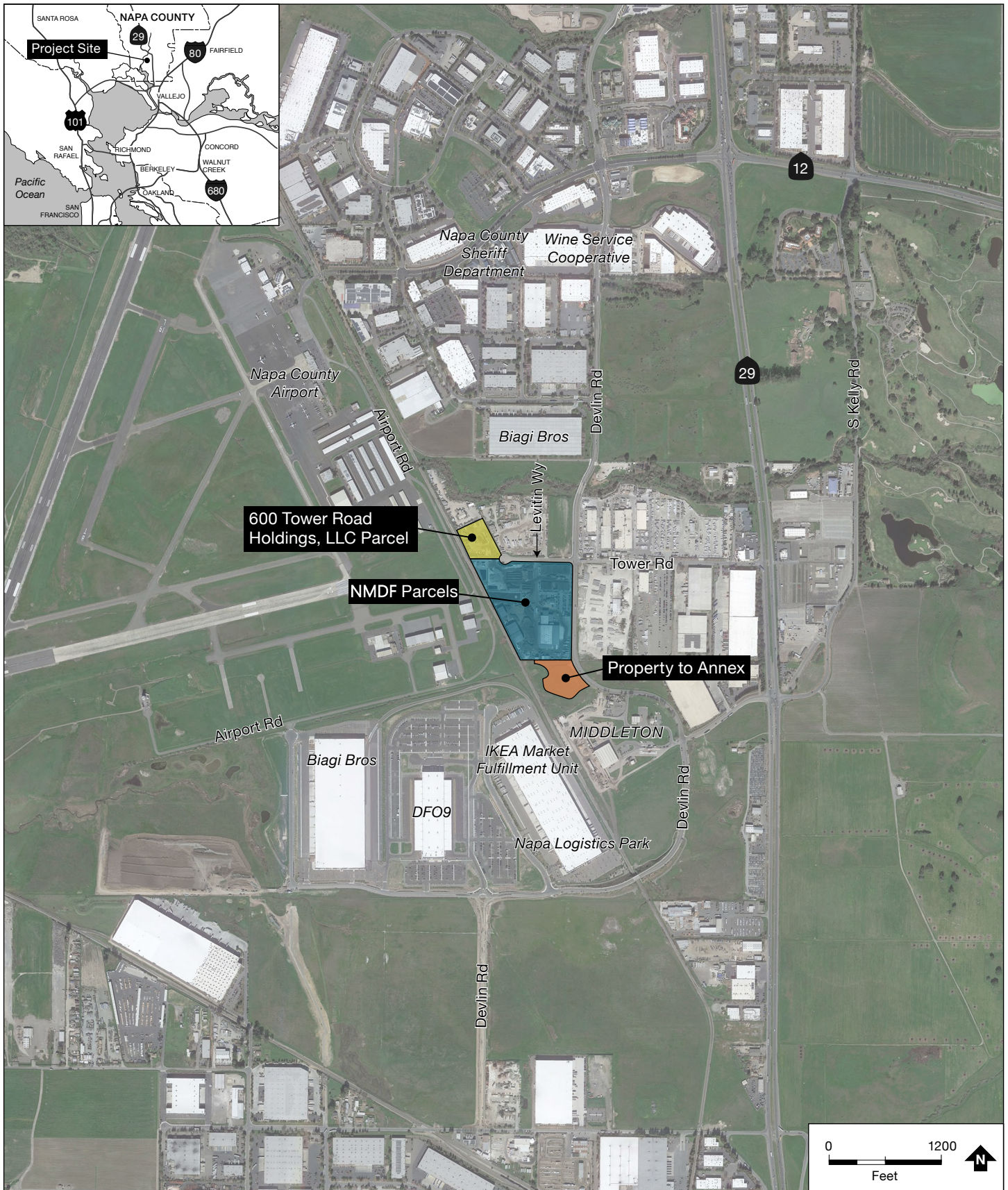
The approved ADF and BGF at NMDF site that were analyzed and approved through the 2013 MND and subsequent Addendums have not been constructed. In May 2023, the City of Napa applied for a \$10,000,000 grant with the Department of Resources Recycling and Recovery (CalRecycle) for funds to develop an ADF on the existing NMDF property. The City of Napa was awarded the grant in December 2023. This EIR analyzes the environmental impacts of the ADF even though it is covered through previous CEQA review and documentation. This conservative approach allows for an assessment of cumulative impacts to key resource areas, such as air quality, greenhouse gas (GHG) emissions, and traffic.

Currently, the City and NRWS are moving forward with Syncraft to design and build the BCF. Since the BCF would be larger than facility analyzed in the 2013 MND and would be developed outside of the current NMDF site, this EIR analyzes the BCF as a new Project element and does not rely on previous CEQA documentation.

2.3 PROJECT LOCATION AND EXISTING SETTING

The Project site includes the NMDF site located at 820 Levitin Way and adjacent parcels (see **Figure 2-1**). The NMDF site comprises approximately 18.6 acres, of which approximately 12 acres are used for organic material management operations such as composting and chip and grind; 1.2 acres for concrete recycling; 2.2 acres for soil stockpiling; 1.2 acres for material recovery facility (MRF) recyclables and product depackaging; and about 2.0 acres for support operations.

The existing site plan for NMDF site is shown in **Figure 2-2**. Existing improvements on the site include an organic material management operation, MRF, shop, administration office and parking, scales, recycling commodities storage area, wallboard stockpile, universal waste area, and inerts processing areas. The organic material management operation includes a biofilter, feedstock tipping area, green waste stockpile, two organics preprocessing buildings (one with a food waste depackager), processed compost feedstock stockpile, unprocessed and processed wood waste stockpiles, compost screening building, finished compost storage area, staging area for compost screening, compost curing area, CASP composting area, finished product storage area, and biochar machine. Stormwater infrastructure on site includes a stormwater filtration system, storage pond, settling pond, and retention pond.



Source: RCH Group; Google Earth Pro, 2023

Figure 2-1
Regional Site Location



Source: Edgar & Associates, 2023

Figure 2-2
Existing NMDF Site Plan

The Project would include a portion of the adjacent parcel to the south (formerly APN 057-090-060) located on the westerly side of Devlin Road between NMDF site to the north and Devlin Road Transfer Station to the south (See **Figure 2-1**). The parcel was purchased by the City in December 2023 and would be annexed into the City subject to approval by Local Agency Formation Commission (LAFCO) of Napa County. A sphere of influence (SOI) amendment would also be required by LAFCO to process the annexation. The existing parcel was subdivided to create a smaller 2.87-acre parcel (APN 057-090-087). The resulting 2.87-acre parcel, referred to as the Southern Annexation Parcel in this EIR, excludes the wetlands that have been identified in previous studies on the parcel that was formerly known as APN 057-090-060 (now APN 057-090-088). The Southern Annexation Parcel is currently undeveloped and includes an area that received soil material from 2019 to 2022. In addition to the development of the Southern Annexation Parcel, the EIR also analyzes the environmental impacts from the future annexation into the City, the pre-zoning of the parcel to Public, Quasi-Public: Airport Compatibility Overlay District (PQ-P:AC) to be consistent with the existing NMDF site zoning, and a General Plan Amendment (GPA) to designate the parcel in the General Plan as Public Serving to be consistent with the existing NMDF land use designation.

The Project would also use a portion of the parcel to the north that is owned by 600 Tower Road Holdings, LLC, an LLC with the same owners as NRWS (APN 057-110-025) (See **Figure 2-1**). The 600 Tower Road Parcel would be used for inert materials processing and storage (relocated from the existing NMDF site). The parcel is currently used for container, equipment, and vehicle storage. The parcel would remain under the same ownership and would allow for operational flexibility as it can be accessed directly from the NMDF site without using Tower Road.

Napa County airport is situated to the west/northwest of the Project site. Directly south of the airport, a range of facilities including hangars and parking are integrated into the airport's operations. Union Pacific Railroad runs adjacent to the western edge of the Project site, while Devlin Road runs adjacent to the eastern edge of the Project site (except for the Tower Road Parcel). Further east, opposite Devlin Road, lie several industrial parcels associated with the construction and building industry. The Project site is bordered to the north and northeast by industrial parcels used for equipment and vehicle storage and is bordered to the south and southeast by vacant land and the Devlin Road Transfer Station. Highway 29 is roughly 2,000 feet east of the Project site. The nearest residence is approximately 2,340 feet to the east of the Project site, across Highway 29 on Café Court. The nearest school is Napa Junction Magnet Elementary School, approximately 1.8 miles south of the Project site.

2.4 PROJECT OBJECTIVES

Pursuant to State CEQA *Guidelines* 15124(b), the Project Description includes this statement of the project objectives. The objectives are intended to demonstrate the purpose of the Project. The primary objectives of the Project include the following:

- To expand the NMDF site operations and support regional recycling and waste management efforts through new operational methodologies.
- To increase the City's ability to divert waste (including organics) from the landfill and continue to meet the state-mandated diversion goals provided in SB 1383, other state-mandates to reduce waste from landfill (AB 341) and reduce greenhouse gas (GHG) emissions (SB 32).
- To increase the NMDF site's efficiency, diversify operations, and operate more economically.
- Implement renewable energy solutions at the NMDF site to reduce reliance on non-renewable power sources and reduce GHG emissions.

2.5 PROJECT ELEMENTS

The Project evaluated in this EIR consists of several changes to NMDF site's existing operations and permits including but not limited to the SWFP and BAAQMD air quality permits. The Project would increase material processing capabilities while enhancing sustainable waste management at the NMDF site. Elements of the Project include:

- Increasing the NMDF site's overall permitted tonnage for all waste types to a weekly average of 1,000 tpd with a daily peak of 1,500 tpd;
- Constructing and operating a BCF on the Southern Annexation Parcel;
- Constructing and operating an ADF on the existing NMDF site; and
- Using a portion of the 600 Tower Road Parcel to the north for relocating existing NMDF inert materials processing and storage.

2.5.1 INCREASED PERMITTED TONNAGE LIMIT

The NMDF site operates under SWFP 28-AA-0030², which limits the facility to a maximum tonnage of 760 tpd and 386 waste hauling vehicles per day. The NMDF site currently has days when waste tonnage would exceed 760 tons if not for the daily limit. Such peak days are typically the result of heavy vehicles delivering inerts (rock/dirt) or seasonal peaks for organics (e.g. grape pomace, leaf fall season, etc.). The Project would increase the overall permitted tonnage for all waste types to a weekly average of 1,000 tpd with a daily peak of 1,500 tpd. The proposed daily permitted tonnage increase is reflective of recent equipment upgrades at the NMDF site (e.g., organics shredder, trommel screens, optical sorters, sorting robots, etc.) that have improved processing efficiency and accommodations for peak days that have higher tonnage of certain waste streams (e.g., dirt, rock, grape pomace, leaf fall season, etc.). It is expected that the new waste received under the proposed tonnage increase would be delivered by haulers servicing surrounding jurisdictions (such as unincorporated Napa County), as is the case under the existing condition.

In addition to the existing overall maximum tonnage limit of 760 tpd, the NMDF site is limited to a peak daily tonnage for organic materials and transfer processing (MRF recyclables and CDI) of 500 tpd and 360 tpd, respectively. The NMDF site proposes to eliminate these waste subcategory limits with the Project along with the overall tonnage limit increase.

The increase in tonnage limits and elimination of waste subcategory limits would assist in accommodating increased demands from new state regulations such as SB 1383³, improved processing at the NMDF site due to recent equipment upgrades, as well as intermittent high tonnage days for inerts and seasonal fluctuations for organics (grape pomace).

The NMDF site does not propose to increase its permitted daily waste hauling vehicles limit since peak days are typically due to heavy trucks bringing in large loads, which results in less waste hauling vehicles to meet peak daily tonnage limits.

2.5.2 BIOMASS CONVERSION FACILITY AND ANNEXATION OF SOUTHERN PARCEL

NRWS proposes the construction and operation of a BCF on the Southern Annexation Parcel to address the growing challenge of processing woody waste. These waste streams include tree trimmings, source-separated construction and demolition (C&D) wood, and compost overs. The BCF aims to convert wood waste into renewable energy, thereby providing a long-term, sustainable alternative to landfill disposal and open pile burning.

A large impetus for this effort was the closure of many conventional biomass energy facilities that considerably increased the cost of diverting wood waste, particularly compost overs, from landfill disposal. NRWS's primary outlet—DTE in Woodland—has seen its capacity to accept

² <https://www2.calrecycle.ca.gov/PublicNotices/Documents/8200>

³ California Department of Resources Recycling and Recovery (CalRecycle), <https://calrecycle.ca.gov/organics/slcp/>, accessed Sept. 26, 2023.

ground wood waste substantially reduced due to a statewide shift toward processing forest and agricultural waste, both of which are prioritized for wildfire mitigation and air quality improvements. As a result, the majority of Napa’s ground wood now ends up in the landfill.

In recent years, securing beneficial reuse pathways for wood waste has become increasingly difficult and costly. NRWS seeks to establish a reliable, cost-effective, and environmentally responsible outlet for approximately 15,000 tons of woody biomass per year for the next 20-plus years. To address this challenge, NRWS has explored a wide range of biomass conversion technologies over several years, including pyrolysis, hydrogen production, and gasification. After in-depth evaluation, gasification⁴ emerged as the most suitable technology to meet both the throughput and energy needs of the NMDF. The proposed BCF would serve the needs of NMDF by:

- Diverting wood waste⁵ from incineration or landfill disposal;
- Reducing truck traffic associated air quality and GHG emissions associated with trucking wood waste;
- Generating clean, renewable electricity to power NMDF operations and selling excess renewable energy to the grid; and
- Producing biochar, a carbon-sequestering soil amendment.

The proposed BCF responds to statewide mandates under SB 1383, supports local organic waste diversion goals, and aligns with California’s climate and renewable energy objectives by reducing landfill-bound organic waste, cutting GHG emissions, and producing carbon-negative byproducts.

In California, there are about two dozen active biomass to energy plants in operation. These plants are fueled primarily by wood waste and agricultural residues. Gasification typically refers to conversion in an oxygen- or air-deficient environment to produce fuel gases (e.g., synthesis gas, also known as “syngas”). The fuel gases are principally carbon monoxide, hydrogen, methane, and lighter hydrocarbons, but depending on the process used, can contain significant amounts of carbon dioxide and nitrogen, the latter mostly from air. Gasification also produces liquids (tars, oils, and other condensates) and solids (char, ash) from solid feedstocks.

The BCF would be developed on the Southern Annexation Parcel, which is currently undeveloped and includes an area that received soil material from 2019 to 2022. The parcel was purchased by the City in December 2023 and would be annexed into the City subject to approval by LAFCO of Napa County. A SOI amendment would also be required by LAFCO to process the annexation. In addition to the development of the Southern Annexation Parcel, the EIR also analyzes the environmental impacts from the future annexation into the City, the pre-zoning of

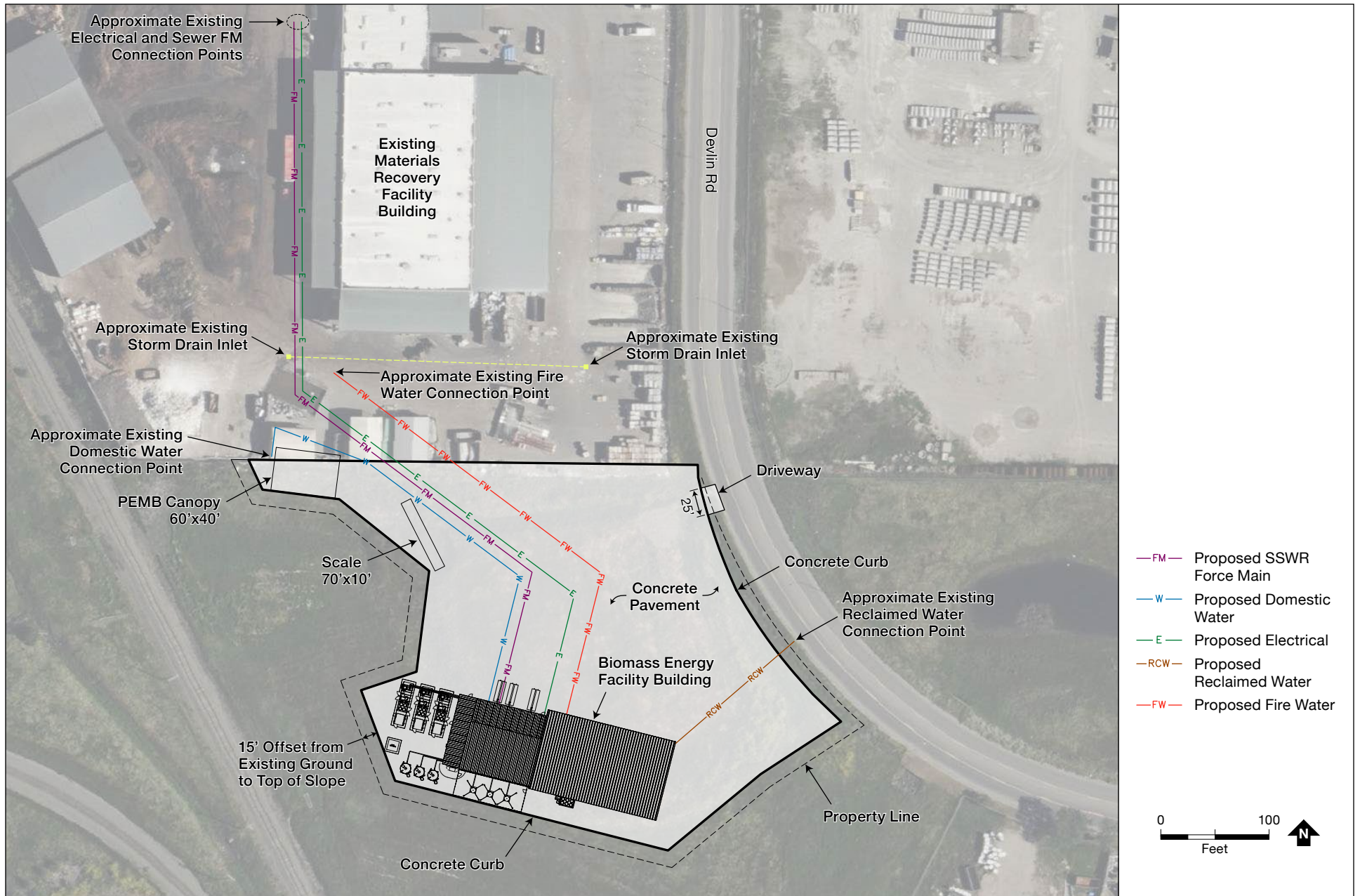
⁴ The Project does not meet the California definition (PRC Section 40106) for gasification and is thus referred to as a Biomass Conversion Facility (BCF). The word “gasification” is used in describing the technology in the context of the Federal EPA definition of gasification (40 CFR part 258).

⁵ Treated Wood Waste (TWW) is disposed of and not diverted per California Department of Toxic Substances Control (DTSC) regulations.

the parcel to PQ-P:AC to be consistent with the existing NMDF site zoning, and a GPA to designate the parcel in the General Plan as Public Serving to be consistent with the existing NMDF land use designation.

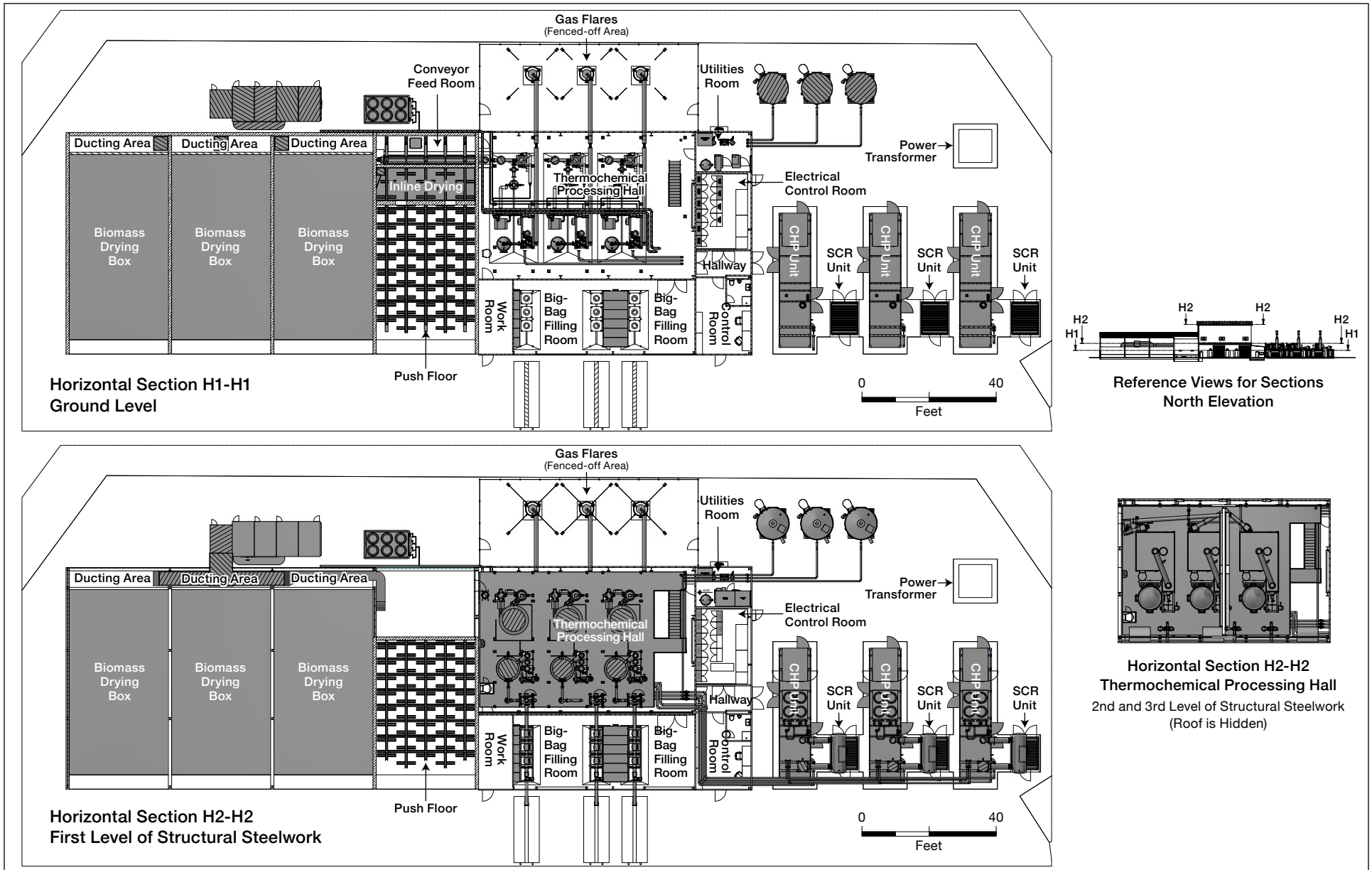
The BCF is designed to generate 1.5 MW of renewable electricity to be used onsite to power NMDF operations, with excess electricity exported to the local electrical grid. The technology provider for the BCF is currently proposed to be Syncraft, a proven European biomass technology provider with multiple operational facilities. The BCF would process approximately 16,000 tons of wood waste per year, enabling NRWS to process 5,000 to 6,000 tons of compost overs annually into suitable biomass feedstock, eliminating the need for offsite disposal and avoiding approximately four truck shipments per day or roughly 1,500 truck shipments per year. Approximately 3,300 tpy of biochar would be generated from the biomass conversion process, which would be marketed and distributed to agricultural and environmental applications that align with carbon sequestration goals. The site plan for the BCF is shown in **Figure 2-3** and the equipment layout is shown in **Figure 2-4**.

The BCF includes feed hoppers, gasifiers, biochar handling equipment, gas clean-up equipment, three 500-kilowatt (kW) output syngas-fueled engines by Jenbacher, and flares. Material handling operations would include the transfer of feedstock to the grinder and an oscillating screen, loading the dryer, and handling and loadout of the biochar. The syngas produced by the gasifier would be captured in a closed vent system and used as fuel for the three Jenbacher engines to produce electricity. Syngas that cannot be combusted in the engine would be disposed of in a limited-use flare assigned to each engine. The BCF building is currently proposed at roughly 45 feet in height at the highest point.



Source: Cunningham Engineering, 2025

Figure 2-3
Biomass Conversion Facility Site Plan



Source: Syncraft, 2025

Figure 2-4
Biomass Conversion Facility Equipment Plan

2.5.3 ANAEROBIC DIGESTION FACILITY

Approved ADF

The existing NMDF site was approved for an ADF through the 2013 CEQA MND and subsequent Addendums. The ADF has not been constructed at NMDF. In May 2023, the City of Napa applied for a \$10,000,000 grant with CalRecycle for funds to develop an ADF on the existing NMDF property. The City of Napa was awarded the grant in December 2023.

The approved ADF to be constructed at the existing NMDF site would require an approximately 22,000 square-foot footprint and would process up to 44,000 tpy of high biomethane potential material such as food waste supplemented with green waste to maintain a solid matrix that is suitable for a plug flow system. The food waste would come from commercial, multi-family dwellings (MFD), residential and self-haul (RSH) sources, and industrial sources. The green waste would be from commercial, MFD, and RSH sources. The amount of tonnage processed through the ADF is ultimately determined by the ratio of high methane producing food waste compared to green waste.

Proposed ADF

The ADF vendor selected by the City is Zero Waste Energy, LLC (ZWE), who is proposing the installation of a Thöni Environmental Engineering Wet Digestion system—specifically, a semi-dry, plug-flow digester. Thöni is a respected vendor with over 30 years of experience and more than 170 facilities operating across 20 countries. As noted previously, the City secured a \$10 million grant through CalRecycle’s Organics Infrastructure Grant Program to support this effort. The proposed ADF would require 32,000 tpy of high biomethane potential feedstock or 44,000 tpy of low biomethane potential feedstock and would generate over 440,000 diesel gallon equivalents (dge) of renewable natural gas (RNG) annually, which would be used to fuel collections vehicles at NMDF. The proposed ADF would serve the needs of NMDF by offering:

- High flexibility with a wide range of organic input materials;
- A compact footprint with seamless integration with NMDF’s current organic pre-processing systems and upcoming grant-funded organics depackager;
- Low labor requirements;
- Production of consistent RNG to fuel collection vehicles; and
- Digestate suitable for blending into the CASP composting process.

At 32,000 tpy of high biomethane potential feedstock, the proposed ADF is currently projected to use the following mix of feedstock:

- 13,000 tpy of foodwaste;
- 9,000 tpy of greenwaste; and

- 10,000 tpy of grape pomace.

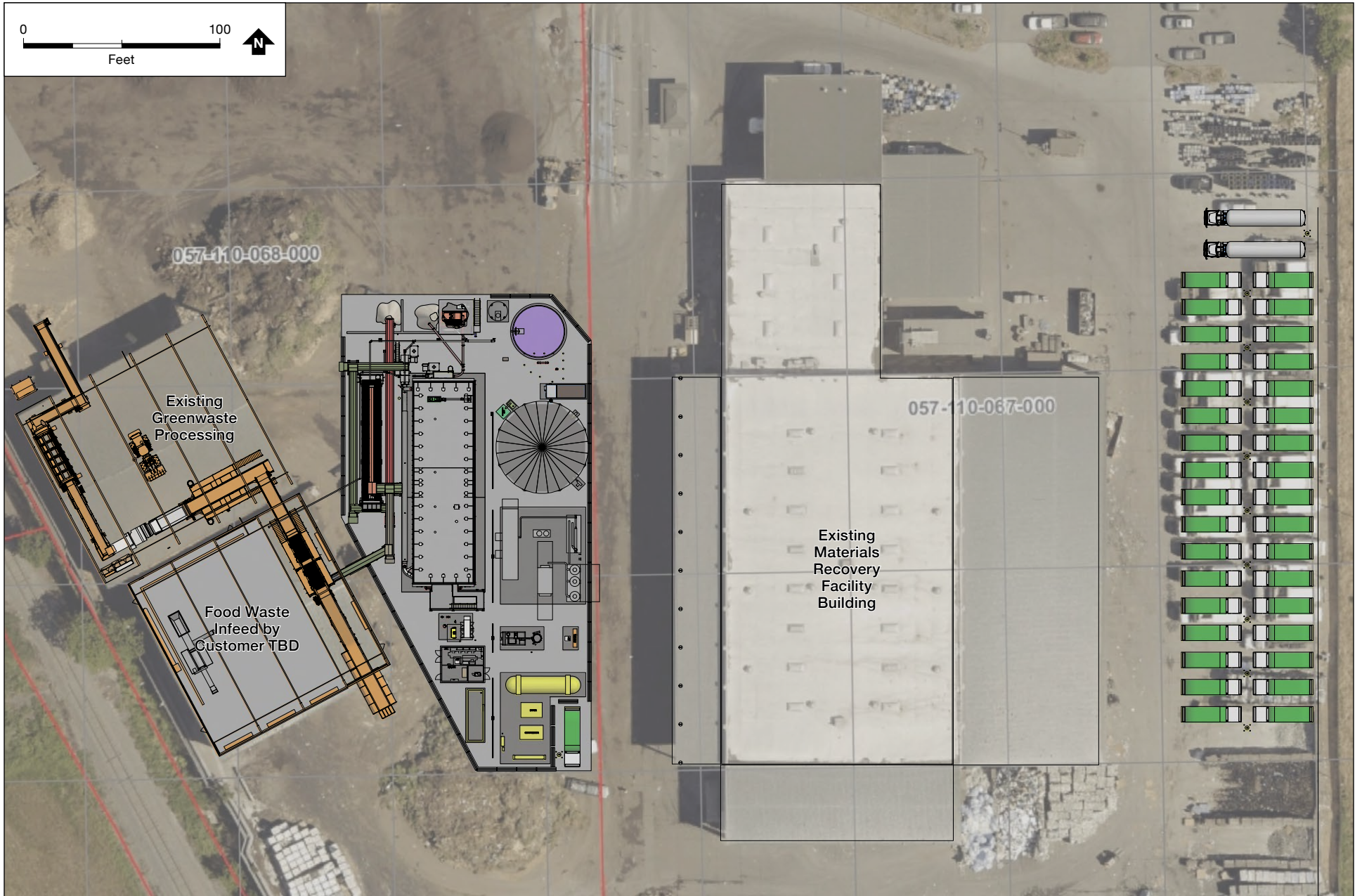
The proposed ADF would be sited between the existing MRF building and existing organics processing buildings in an approximately 22,000 square foot area as shown in **Figure 2-5**. The proposed ADF includes conveyors, receiving hoppers, a digestate sieve, the digester itself, a flare, a boiler, an emergency generator, biogas upgrading and fueling station equipment, and various other pieces of ancillary equipment and infrastructure as shown in **Figure 2-6** and uses a continuous plug-flow system to produce biogas and digestate.

The AD system accepts preprocessed feedstock materials and the loading process is highly automated. Pre-processed feedstocks are conveyed to a walking floor loading bunker with speed regulated to meter feedstock to the digester via an infeed piping. From the loading bunker, the feedstock would be charged to a dual-shaft mixer that further homogenizes the feedstock and has the capability to add stored winery waste and digestate press water. Following mixing, the feedstock is hydraulically pumped through a heat exchanger tube that pre-heats the feedstock while it is pumped to the front of the AD system. The AD system uses a single plug-flow biological reactor where feedstock is loaded one on end, mixed with paddles, and digestate is unloaded on the other. Although the waste would be homogeneous, the stirrers have capacity to handle difficult materials and perform well with a variety of feedstocks.

The digestion process inside the AD system is based on an anaerobic, thermophilic, biological process that is characterized as High Solids Anaerobic Digestion. The digester has a process temperature of approximately 131°F and an average dry substance content of >25%. Process temperature will be maintained via a process hot water system. The residence time of the feedstock in the digester is approximately 21 days but may range from 19 to 36 days depending on the volume of input material processed.

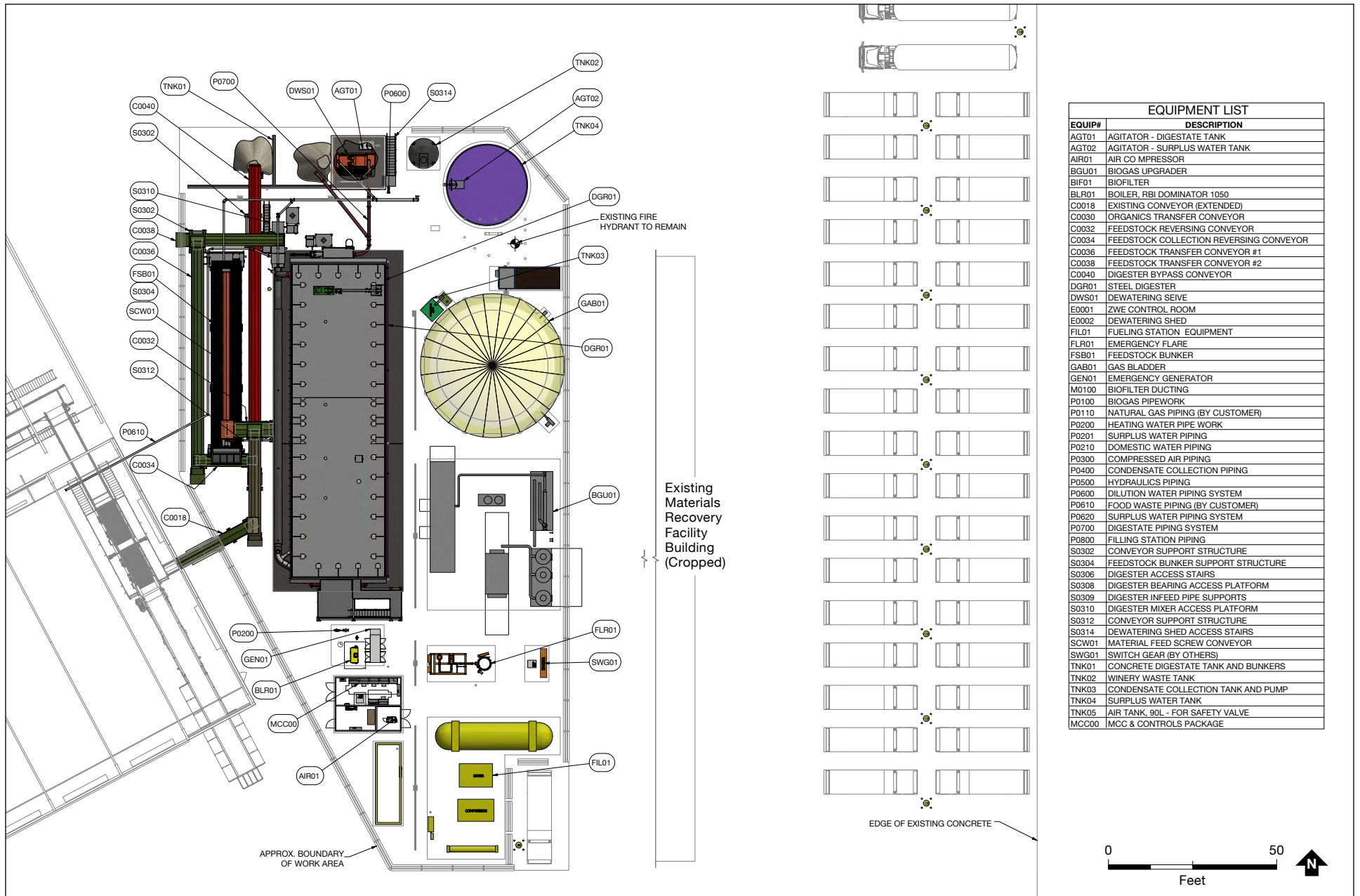
The high solids AD system generates and stores biogas. Biogas is captured in the headspace of the digester and piped to a biogas storage buffer. Biogas is a biological by-product of anaerobic digestion and is comprised primarily of methane and carbon dioxide. The biogas is collected until methane content reaches 22% at which point the purged biogas is combined with some of the stored biogas and sent to the burner/boiler system. The stored biogas would then be routed to a biogas conditioning system where impurities like hydrogen sulfide and water are removed. The resulting RNG would be boosted to 3600 pounds per square inch (psi) and dispensed in an onsite time-fill fueling system which will supply NMDF collection vehicles.

Digestate would be extracted from AD system by a hydraulic pump to a dewatering station where it will be processed by a vibrating screen that separates the liquid and solid fractions. Recovered liquids, or “press water” is stored in concrete vault below the dewater system. Press water would be recirculated and mixed with incoming feedstock at the digester mixer or pumped to a truck for use as a liquid fertilizer. Recovered solids are temporarily stored in a bunker adjacent to the dewatering system. Solid digestate would be transferred by NRWS to the existing CASP system located at the NMDF for further processing.



Source: Zero Waste Energy, 2024

Figure 2-5
Anaerobic Digestion Facility Site Plan



EQUIPMENT LIST	
EQUIP#	DESCRIPTION
AGT01	AGITATOR - DIGESTATE TANK
AGT02	AGITATOR - SURPLUS WATER TANK
AIR01	AIR CO MPRESSOR
BGU01	BIOGAS UPGRADER
BIF01	BIOFILTER
BLR01	BOILER, RBI DOMINATOR 1050
C0018	EXISTING CONVEYOR (EXTENDED)
C0030	ORGANICS TRANSFER CONVEYOR
C0032	FEEDSTOCK REVERSING CONVEYOR
C0034	FEEDSTOCK COLLECTION REVERSING CONVEYOR
C0036	FEEDSTOCK TRANSFER CONVEYOR #1
C0038	FEEDSTOCK TRANSFER CONVEYOR #2
C0040	DIGESTER BYPASS CONVEYOR
DGR01	STEEL DIGESTER
DWS01	DEWATERING SEIVE
E0001	ZWE CONTROL ROOM
E0002	DEWATERING SHED
FIL01	FUELING STATION EQUIPMENT
FLR01	EMERGENCY FLARE
FSB01	FEEDSTOCK BUNKER
GAB01	GAS BLADDER
GEN01	EMERGENCY GENERATOR
M0100	BIOFILTER DUCTING
P0100	BIOGAS PIPEWORK
P0110	NATURAL GAS PIPING (BY CUSTOMER)
P0200	HEATING WATER PIPE WORK
P0201	SURPLUS WATER PIPING
P0210	DOMESTIC WATER PIPING
P0300	COMPRESSED AIR PIPING
P0400	CONDENSATE COLLECTION PIPING
P0500	HYDRAULICS PIPING
P0600	DILUTION WATER PIPING SYSTEM
P0610	FOOD WASTE PIPING (BY CUSTOMER)
P0620	SURPLUS WATER PIPING SYSTEM
P0700	DIGESTATE PIPING SYSTEM
P0800	FILLING STATION PIPING
S0302	CONVEYOR SUPPORT STRUCTURE
S0304	FEEDSTOCK BUNKER SUPPORT STRUCTURE
S0306	DIGESTER ACCESS STAIRS
S0308	DIGESTER BEARING ACCESS PLATFORM
S0309	DIGESTER INFEEED PIPE SUPPORTS
S0310	DIGESTER MIXER ACCESS PLATFORM
S0312	CONVEYOR SUPPORT STRUCTURE
S0314	DEWATERING SHED ACCESS STAIRS
SCW01	MATERIAL FEED SCREW CONVEYOR
SWG01	SWITCH GEAR (BY OTHERS)
TNK01	CONCRETE DIGESTATE TANK AND BUNKERS
TNK02	WINERY WASTE TANK
TNK03	CONDENSATE COLLECTION TANK AND PUMP
TNK04	SURPLUS WATER TANK
TNK05	AIR TANK, 90L - FOR SAFETY VALVE
MCC00	IMCC & CONTROLS PACKAGE

Source: Zero Waste Energy, 2024

Figure 2-6
Anaerobic Digestion Facility Equipment Plan

2.5.4 UTILIZATION OF A PORTION OF THE NORTHERN PARCEL

The Project would use a portion of the parcel to the north that is owned by 600 Tower Road Holdings, LLC, an LLC with the same owners as NRWS (APN 057-110-025) (See **Figure 2-7**). The 600 Tower Road Parcel would be used for inert materials processing and storage. The parcel is currently used for containers, equipment, and vehicle storage. The parcel would remain under the same ownership and would allow for operational flexibility as it can be accessed directly from the NMDF site without using Tower Road.

2.6 SITE ACCESS AND PARKING

The NMDF site is accessed via Levitan Way from Tower Road. The 600 Tower Road Parcel to the north is accessed via Tower Road at the end of the cul-de-sac and can also be accessed through the existing NMDF site. The proposed BCF on the Southern Annexation Parcel to be annexed into the City would be accessed via a new driveway off of Devlin Road (see **Figure 2-3**) and existing NMDF access at Levitan Way (see **Figure 2-2**).

The NMDF site's administration office currently provides parking. The BCF on the Southern Annexation Parcel to be annexed into the City would be completely paved and would include additional parking spaces for staff and visitors. The 600 Tower Road Parcel would remain as is for inert materials processing and storage.

2.7 PROJECT EMPLOYMENT

The Project would create temporary construction jobs and would also create permanent professional positions. The Project is expected to create 6 permanent professional positions for operating the ADF and BCF. NRWS would aim to provide jobs to a qualified, professional group of staff members that would best implement the goals and mission of the Project.

2.8 HOURS OF OPERATION

The NMDF site operates 24 hours per day, seven days per week for commingled and source separated recyclables processing and CASP composting. Future ADF operations are permitted to operate 24 hours per day per the SWFP. The proposed BCF would operate 24 hours per day, seven days per week. Mixed waste processing at the NMDF site is limited to 6 a.m. to 6 p.m. NMDF is closed New Year's Day, Easter, Thanksgiving, and Christmas. Receipt of refuse/waste/feedstock is permitted 7 days per week with commercial vehicles limited to 5 a.m. to 5 p.m. and public vehicles limited to 8 a.m. to 5 p.m. The Project does not propose any changes to NMDF hours of operation.



Source: RCH Group; Google Earth Pro, 2025

Figure 2-7
600 Tower Road Parcel

2.9 CONSTRUCTION

The Project would require construction activities on the Southern Annexation Parcel for development of the BCF and on the existing NMDF site for development of the ADF. To be conservative, it was assumed that the BCF and ADF would be constructed simultaneously for approximately 19 months. Construction phases would consist of site preparation, construction of footings/retaining walls, earthwork/rough grading, underground utilities, building construction/equipment installation, paving, and architectural coating. Approximately 4,864 cubic yards of material would be exported from the Southern Annexation Parcel during the earthwork phase, requiring a total of 608 truck trips. The existing NMDF site area for the ADF is currently paved and would receive new concrete for foundations. It is estimated that an average daily construction crew of 25 employees would be present on-site during construction. Construction would occur 7:00 a.m. to 7:00 p.m. Monday through Fridays and 8:00 a.m. to 5:00 p.m. on weekends, consistent with the City of Napa Municipal Code Section 8.08.025.

Other construction activities on the NMDF site would consist of moving existing equipment and storage areas to other areas of the NMDF site. These activities could happen with or without the Project. The 600 Tower Road Parcel would not require construction activities and would continue to be used for storage.

2.10 REGULATORY REQUIREMENTS, PERMITS AND APPROVALS

The City of Napa would be required to approve the Project prior to development of the Project. The City would use information contained in this EIR during the decision-making process. Permits and approvals from other agencies would be necessary prior to the development of the Project. Known entitlements, permits, and approvals required for the Project are identified below.

City of Napa:

- Certification of Final EIR;
- Adoption of a Mitigation Monitoring and Reporting Plan (MMRP), Findings, and Statement of Overriding Considerations (if necessary); and
- Approval of the Conditional Use Permit, Site Plan, Pre-Zoning, GPA and Other City permits such as Building and Grading Permits.

Other Governmental Agency Approvals:

- Annexation Approvals (including SOI amendment) from LAFCO and the County of Napa;
- Revisions to SWFP from CalRecycle;
- The BAAQMD requires an Authority to Construct/ Permit to Operate (ATC/PTO) for new or modified equipment that emits air pollution related to the operation of the Project (ADF and BCF); and
- The San Francisco Bay Regional Water Quality Control Board (RWQCB) requires a National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water

Discharges Associated with Construction and Land Disturbance Activities. Operation of the expanded NMDF would be subject to coverage under the NPDES Industrial Permit.

2.11 REFERENCES

CalRecycle. Solid Waste Facility Permit, Facility Number 28-AA-0030.

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