

Napa County Planning Commission

1195 Third Street, Suite 216

Napa, CA 94559

Dec. 1, 2025

Dear Commissioners:

I am writing today about the use permit application before you for two use related use permits for related projects, #P22-00307 and #P22-00302, located on Technology Way in the Airport Industrial Park.

I will begin by defining adjectives that are painfully apt for the debate surrounding this project. In the Merriam-Webster Dictionary, “recondite” “ is defined as “a formal word used to describe something that is difficult to understand or something that is not known by many people.” Likewise in the Merriam-Webster Dictionary, “ ‘tendentious’ is a formal word used to describe someone or something expressing a strongly biased point of view.in a way that may cause argument.” Before the Commission are arguments from both the applicant and his consultants in support of the project, and from opponents an attempt to refute the applicant’s arguments. Taken together, I think the analysis from both sides have earned the characterization of being both recondite and tendentious.

I write to you today to suggest it might serve the interests of the public to step away from back-and-forth represented in the packet. I will ask you to consider one particular aspect of the analysis of the project, that of the analysis of greenhouse gas (GHG) emissions. As we can read from the application, these fall into two categories, emissions from the construction of the project, and those from the operation of the project over the lifetime of the infrastructure. For the former, there are policy measures beyond the scope of this application that could be applied to all new construction: low-carbon concrete, low VOC coatings,” sustainable” fuels for construction equipment, and Tier 4 engines for equipment.

For the lifetime of the project, the application goes part-way to committing to lower GHG emissions, but there are many measures that are technically feasible right now and that will reduce emissions from the outset. It is not clear to me from the packet whether these measures will or will not be incorporated without your intervention, nor am I entirely clear what your powers of exaction are in the ever-changing arena of federal, state, and county policy.

Here is my list, which is by no means exhaustive:

- 1) In reading the materials in the packet, it is not clear to me if the project will incorporate a “cool roof” coating system. Obviously, a small expenditure here will pay dividends in terms of reduced energy use for the life of the buildings.
- 2) The winery building will require a supply of hot water; a heat pump boiler is well-suited to meet this need.
- 3) Our local Community Choice Aggregator, MCE Clean Energy, offers a 100% renewable electricity portfolio. Choosing this option is a painless low-cost means of reducing GHG emissions.
- 4) In addition to reducing or eliminating GHG emissions from the buildings themselves,, a warehousing and logistics operation like this project has additional opportunities to reduce transportation emissions. The first is buildout of an EV charging network in the parking lots. In addition, since fulfillment is the one of the purposes of the warehousing function, make provision for rapid DC charging for class 8 semi-trucks and for box trucks for “the last mile”.
- 5) Speaking of the parking lots, with combined parking spaces for over 210 cars, a photovoltaic array over them can double as a shade structure, with large-scale batteries (e.g. iron-airflow) pairing well with a system of considerable scale like this one to supply electricity after sunset.

In conclusion, the baseline requirements for use permit projects have increased over time. Building energy standards have been rising for decades. Water efficiency continues to increase. Electric vehicles are now a viable alternative to internal combustion in transportation. Utility customers can now choose 100% renewable electricity. Let’s not build GHG emissions into projects when there are viable, cost-effective solutions.

Sincerely,

David Graves

459 Randolph St.

Napa 94559