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## Recommended Findings

## **Airport Land Use Commission Hearing – July 1, 2026**

### **Recommended Findings**

#### **Napa Renewable Resources Project 2.0**

#### **Compatibility Determination P25-00305**

#### **South of 820 Levitin Way, Napa (APN: 057-090-087) and 600 Tower Road, Napa (APN 057-110-025)**

##### Environmental:

The Airport Land Use Commission's (ALUC) Consistency Determination does not meet the definition of a "project" as defined by 14 California Code of Regulations 15378 (State CEQA Guidelines) and, therefore, CEQA is not applicable. The ALUC is only making a finding of consistency with regards to airport compatibility regulations and is not responsible for approving or undertaking the project. The City of Napa is the Lead Agency responsible for carrying out the project and the City of Napa has prepared a Draft Environmental Impact Report (January 2026) (State Clearinghouse #2023110393, the City of Napa will determine if any additional required CEQA findings need to be made before taking final action on the proposed City of Napa Renewable Resources Project 2.0.

##### Special Conditions Exception:

The ALUC has reviewed the Special Conditions Exception request in accordance with the requirements of the Airport Land Use Compatibility Plan (ALUCP) §3.2.4 and makes the following findings:

1. The ALUC has determined why the exception is being made.

**Analysis:** The ALUC has determined that the exception is being made because of specific location and circumstances related to the site. The Project is consistent with surrounding industrial uses, was long planned in the City's General Plan, and cannot be accommodated within the existing Napa Materials Diversion Facility (NMDF) footprint.

The proposed Biomass Conversion Facility (BCF) use is consistent with the surrounding industrial land uses (NMDF to the north and Devlin Road Transfer Station to the south). The property south of NMDF proposed for the development of the BCF was purchased from the Napa-Vallejo Waste Management Authority (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.”

2. The ALUC has determined that the land use will not create a safety hazard to people on the ground.

**Analysis:** The ALUC has determined that the Project will not create a safety hazard to people on the ground because the proposed BCF is an industrial facility with limited onsite employees (up to three employees at a given time). In addition, 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.

3. The ALUC has determined that the land use will not create a safety hazard to aircraft in flight.

**Analysis:** The ALUC has determined that the Project will not create a safety hazard to aircraft in flight with the implementation of Condition of Approval No. 2.0(b) and No. 2.0(c). Condition of Approval No. 2.0(a) states as follows:

“The Napa Renewable Resources Project (NRRP) 2.0 project shall complete a wildlife hazard assessment (WHA) leading to a wildlife hazard management plan (WHMP), to include baseline data, data after the imminent NRRP 1.0 modifications expected to reduce wildlife attractant and assess data after the proposed City of Napa NRRP 2.0 Project is implemented at the recycling facility. The WHMP will be prepared using the same biological expertise as the Napa County Airport WHMP. The airport will update its 2017 plan. The plans will identify relevant species and populations posing a danger to aircraft in the area, characterize the habitat, water, and food sources that are attractants to significant animal and bird populations, and identify recommended approaches based on data to coordinate habitat modification, hazing, and

degradation activity. The scope of work for the Airport WHMP will adhere to FAA Advisory Circular 150-5200-33C and 150-5200-38.”

Condition of Approval No. 2.0(c), states as follows:

**AIRCRAFT OVERFLIGHT EASEMENT**

Upon building permit submittal, the permittee shall submit verification that an aviation easement has been recorded on the property that provides for the right of aircraft operation, overflight and related noises, and for the regulation of light emissions, electrical emissions, or the release of substances such as steam or smoke which could interfere with aircraft operations.

4. The ALUC has determined that the Project will not result in excessive noise exposure for the proposed use.

**Analysis:** The machinery used in the process of converting biomass into energy, such as clippers, grinders, and generators, can create noise. The ALUC has determined that the Project will not create result in excessive noise exposure for the proposed use, with the implementation of Condition of Approval No. 2.0(b), which states as follows:

Noise associated with the BCF will not exceed the exterior noise limits described in Napa County Code Section 8.16.070, Table 8.16.070 Exterior Noise Limits, which is 75 dBA anytime.

5. The ALUC shall determine the nature of the extraordinary circumstances that warrant the policy exception.

**Analysis:** The ALUC has determined the nature of the extraordinary circumstances that warrant the policy exception. Environmentally, the Project 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 Federal Aviation Administration that the proposed BCF poses no hazard to air navigation, and as noted additional Conditions of Approval are recommended to ensure that there are viable measures to address wildlife hazard and noise concerns. Collectively, these factors demonstrate that special conditions apply and support ALUC approval of the requested exception.