



Dedicated to Preserving the Napa River for Generations to Come

February 22, 2016

Delivered via email to: commentletters@waterboards.ca.gov

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



SUBJECT: Comment Letter – General Order for Recycled Water Use

To Whom It May Concern:

We appreciate the opportunity to comment on the proposed general order for recycled water use. The Napa Sanitation District is an independent special district serving a population of 82,700 in the City of Napa and surrounding unincorporated areas. The District treats an average of 9 million gallons of wastewater each day at its Soscol Water Recycling Facility. The District produces unrestricted “tertiary” quality recycled water for irrigation of landscaping, industrial parks, golf courses, pasture lands, feed and fodder crops, a cemetery, Napa Valley College ball fields and landscaping, a recreational park, Napa State Hospital, and drip irrigation of vineyards.

The District has reviewed the draft order and has three comments as shown below.

1. A Change Petition Should Not Be Required for Wastewater Discharges to Tidal Waterbodies

When the District is not recycling, discharge of treated wastewater is conveyed to a tidal portion of the Napa River approximately ten miles downstream from the point at which fresh water meets tidal water. As a result, the water in the Napa River in the vicinity of, or upstream or downstream from, the discharge is *not* suitable for potable or agricultural uses. In addition, the amount of water diverted for recycled water use is negligible in an aquatic life or biological context due to the overwhelming hydrodynamics of the tides in this significant estuary.

Not surprisingly, the points of diversion for water rights holders along the Napa River occur many miles upstream of the Soscol Water Recycling Facility, according to the eWRIMS database. The fact that all points of diversion are miles upstream from the discharge point is evidence that the location of the District’s discharge is impacted by salt water so often and to such extent that no one even tries to divert water for beneficial use in the area.

As a result, Water Code 1211 should not apply, and a “Petition for Change” form should not be required for water recycling projects implemented by the District with water produced at the District’s Soscol Water Recycling Facility. The change petition process is overly burdensome and costly in this circumstance, with no apparent benefit.

In order to maximize the encouragement of recycled water use in a way that also protects human health and the environment, the District specifically requests that discharges to tidal waterbodies diverted for use as recycled water under this permit *not* be subject to Water Code Section 1211. It is our understanding that the State Water Resources Control Board has the discretion to make this decision.

2. The District Would Like to Make Sure that Written Approvals Would Not be Required for Adding Users

In section C.3, page 21, the proposed order indicates that:

“The Administrator shall obtain written approvals for any changes...for example: new recycled water use types or distribution methods not already described in the Administrator’s approved program.”

The examples cited for approval seem appropriate. However, the District intends to continue the expansion of its recycled water program by continually adding new users over time, and believes it would be overly burdensome to obtain approval every time a new user is added. The District requests that the general order be clear that approvals are not needed for adding new recycled water delivery pipelines or new users.

3. As With the Previous Recycled Water General Order, Coverage Should be Up to the Agency if It Has an Alternative Permitting Mechanism

The District is currently covered under the San Francisco Bay Regional Water Quality Control Board’s Order No. 96-011 and desires the option to remain under this order for existing, expanded and new projects. The Notice of Public Hearing for the proposed General Order states that it will be used “to streamline permitting” of recycled water use. To truly honor this intent, the agencies should make the decision whether to opt in to the statewide general order for water recycling.

The District specifically requests that the language included in the adopted 2014 Order allowing a recycler to make an election regarding coverage for new and existing projects be restored.

Thank you for the opportunity to comment on this draft order. Please let me know if you have any questions or would like to discuss any part of these comments.

Sincerely,



Timothy B. Healy, PE
General Manager/District Engineer