



Public Works Department – Water Division

February 12, 2016

Ms. Dana Ayers
Napa County Planning, Building, & Environmental Services
1195 Third Street, Suite 210
Napa CA 94559

Subject: Oak Knoll Hotel Use Permit Application Number 14-00215 at 5091 Solano Avenue, Napa, CA (APN 035-031-009)

Dear Ms. Ayers,

We have reviewed the permit application and Initial Study for Napa County for a conditional use permit at 5091 Solano Avenue (Napa County Assessor's Parcel Number 035-031-009). As previously documented in letters from the City dated January 24, 2007, May 21, 2014, and July 14, 2014, although the project is located outside the City limits and outside the City's Rural Urban Limit ("RUL") line, there is an existing one-inch City water service and an existing ¾-inch City water service to the Property. The use permit application does not request any changes to these current City water services; however, the application proposes to rely upon those water services to serve a project that would significantly expand the historic use on the property. The City has a number of concerns with the proposed project summarized as follows and explained in more detail below:

1. The existing water services are undersized for the use proposed by the application, and do not comply with the City's design standards regarding the sizing of water services for the proposed project.
2. The project will increase demands from annual use averaging 5 acre-feet per year with a daily range of 2,800 to 8,200 gallons per day (based on historic use of water at the property from 1996-2002) to over 13 acre-feet per year based on projected usage of 12,000 gallons per day (for the proposed project).
3. The project relies upon a private system of on-site storage and pumping to take City water supply and deliver it to the project. This is a work-around to avoid modifications to the water services, and it creates a public water system subject to State Division of Drinking Water Regulation since it serves 25 or more persons per day.
4. The proposed expansion of use on the property for a hotel is not a use that was in existence prior to City Charter Section 180 (March 2, 1999), and it generates water demands that require a new water service. City Charter section 180 limits the City's ability to serve water outside the RUL.

Section 5.01.02 of the City of Napa's Public Works Department Standard Specifications and Standard Plans require water services to be sized appropriately for their intended use. Based on these standards, the existing service pipes and meters serving this site are undersized for the proposed use. Meters from a public water system are designed to accommodate all demands from the property without the need for

on-site storage and pumping systems to meet peak demands. The proposed use (which includes a 50 room full service hotel with retail, full service spa, and restaurant) would typically require a 4 or 6-inch fire service and a 1.5 or 2-inch meter to meet the projected demands without detrimentally affecting the water facilities including the service meter. If this project were proposed in the City the project would be conditioned to install appropriately sized water services to comply with the City's Standards and the City recommends the County insure the project meets these standards.

The application states the proposed use will consume 12,000 gallons of water per day which is 13.4 acre-feet of water per year. This proposed use is nearly three times greater than the historical average use of 5 acre-feet per year. In other words, this is more than an 8 acre-feet per year increase in demand. The City's water supply planning does not account for this significant intensification of use outside the City limits. The City remains concerned that this type of significant increase in water demand from existing services outside the RUL will set a precedent that may have an adverse effect on the availability of water supplies in the future. Furthermore, if this type of significant intensification of usage of existing water meters (continuous pumping beyond the intended use of the meters, with onsite storage) occurred throughout the City's water system, it would have a serious impact on the City's ability to meet California Department of Health as well as American Water Works Association Standards of operational criteria for fire-flow and in-system storage.

The project proposes to take supply from the City through existing undersized meters (that were sized to serve much less intense historical uses on the property) and create a private water system on-site to store and distribute the water to meet peak demands. This is a work-around to avoid installation of appropriately sized water services to meet the demands generated by the proposed project. The reliability of an onsite system to meet public health and safety requirements as compared to a properly sized service from the City system should be reviewed by County staff, specifically the Environmental Health Division. As the Environmental Health Division staff is aware, if a project serves 25 or more persons per day it meets the definition of a public water system and must comply with State Division of Drinking Water's regulations for potable water. The project should provide details of the onsite monitoring and reporting of chlorine residual as well as formation of disinfection by-products during water storage, noting that a plan for chlorine injection system and treatment will be required.

Furthermore, the project application states that emergency water (approximately 70,000 gallons) will be trucked from the San Jose Water Company. The City suggests that the County confirm the reliability of this source. The City suggests the County consider the potential environmental impacts of 23 trucks hauling 3,000 gallons of water each from San Jose to Napa when the County considers the adequacy of the CEQA document.

Given these concerns, City staff recommends that the County require the project to install appropriately sized water services to meet commercial and fire water flows for the proposed project. New water services to the property will require a four-fifths vote of City Council pursuant to City Charter Section 180. Alternatively, the County should restrict the use of the existing City water services to the uses that existed prior to City Charter Section 180 (March 2, 1999) and to the historical average annual use of 4,800 gallons per day.

If you have any further questions or concerns, please feel free to contact me at (707) 257-9521, extension 7319.

Sincerely,



Joy Eldredge
Water General Manager
Public Works, Water Division

Cc (via email): Mike Parness, City Manager
Michael Barrett, City Attorney

Jacques LaRochelle, Public Works Director
Rick Tooker, Planning Director
Phil Brun, Deputy Public Works Director – Operations
Brendon Freeman, LAFCO Executive Director
Brian Russell, Applicant's Representative
Greg Pitts, Applicant

Cc (via hard copy): Scoop/File