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October 8, 2014

Mr. John H. Madigan,  
SF Bay Regional Water Quality Control Board

[JMadigan@waterboards.ca.gov](mailto:JMadigan@waterboards.ca.gov)

Re: Tentative Cease and Desist Order for City of Calistoga, Dunaweal Wastewater Treatment Plant, Napa County

Dear Mr. John H. Madigan,

As the Logging Review Program Manager for Forest Unlimited I recently attended the 2nd review for THP 1-13-126 NAP which proposes aggressive timber removal in the City of Callistoga for development of the Callistoga Hills Resort (formerly Enchanted Resorts, Inc.). I was very impressed with the concern expressed by the SF Bay Regional Water Quality Control Board on the cumulative impacts this logging activity would have especially on the Northern Napa River watershed. I was also very impressed with the high level of professionalism by all involved in the review, especially the waterboard representative Kevin Brown (via telecon). Although obviously not part of the THP review itself, the status of the Callistoga CDO for the Dunaweal Wastewater Treatment Plant came to my attention and I would like to provide the following comments on it.

- The violations discussed in the proposed Callistoga CDO are extremely serious and warrant enforcement to the fullest extent in order to protect the public and the Napa River. The Napa River is considered impaired under the Clean Water Act

which allow no activity to further degrade it. It is to be hoped that the CDO action will be taken at the November 12 meeting to cause the City of Callistoga to remedy the Dunaweal Plant and thus keep the Napa River from additional impairment.

- It is the opinion of Forest Unlimited that the development activity proposed for Callistoga Hills would have the effect of further stressing the already overloaded Dunaweal Treatment Plant which is the subject of the CDO. The City of Callistoga should understand that suspension of all large new development activity would assist it to conform to water quality regulations and to execute the prescribed corrective actions proposed by the Regional Water Board in Table I of the Callistoga CDO.

The following comments reference specific sections of the document entitled "Tentative Cease and Desist Order No. R2-2014-XXXX" on the waterboards website.

- 19 and 20. Measurements of antimony concentrations in the Napa River exceed allowable limits as a result of outflow from the Dunaweal Plant. This is said to be originating from inflow from commercial geothermal spas connected to the City's wastewater system. What other heavy metals have been measured in the river and plant outflow? Since the primary source is over-exploitation of underground hot springs, it is unlikely that antimony is the only such element present. Other dangerous, regulated heavy metals are likely present in the water at some levels. Although an analysis of the chemistry of the Callistoga hot springs is not readily available to the public, hot spring waters frequently contain lead, arsenic, radon, radium, cadmium, selenium and sulfur. All regulated contaminants in the mineral water should be measured, monitored and prevented from entering the Napa River for the benefit of aquatic resources, agriculture and public health. As the Regional Water Board is aware, some of these contaminants may concentrate in the soil if the river is used for irrigation or enter the public supply if the river is used for drinking.

- Table 1, Task a., item 4. "Reduce geothermal inflows to the plant" is not sufficiently specific to protect the Napa River. An obviously poor solution would be to direct these inflows directly to the River bypassing the plant. This will satisfy the plant outflow requirement as worded but will not contribute to

eliminating antimony as well as other dangerous heavy metals including boron, lead, radon, radium, cadmium, selenium, cyanide, arsenic, copper, ammonia, sulfur, mercury, salts, grease, oil, and PCB's from entering the Napa River watershed. Forest Unlimited would appreciate forwarding any information concerning additional contaminants entering the Northern Napa River Watershed especially from geothermal sources.

Forest Unlimited appreciates the Regional Water Board's attention and requests that these comments be made part of the record.

Sincerely,

Dr. John W. Cruz

Forest Unlimited Logging Review Program Manager