



IRONHOUSE SANITARY DISTRICT

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September 17, 2021

Oakley City Hall
Attn: Oakley City Council
3231 Main Street,
Oakley, CA 94561

RE: City's General Plan Public Review Draft – August 2021

Mayor Higgins and Fellow Members of the City Council:

Ironhouse Sanitary District (ISD) has reviewed the City's General Plan Public Review Draft - August 2021 (Plan) document and is providing comments below.

ISD applauds the City's efforts in preparing an Update to the General Plan as well as including Environmental Justice and Climate Change and Adaptation.

General comments

- Population and demographic data reflects Department of Finance estimates and should be revised to reflect recently released 2020 census data.

Growth Management

Wastewater Services

ISD owns and operates a state of the art Water Recycling Facility. This facility treats wastewater and produces tertiary treated disinfected recycled water that may be used for a variety of beneficial uses to promote drought resiliency and water reuse, while also supporting Oakley's economy and protecting the environment. ISD is actively pursuing the highest beneficial usage of recycled water. The comments below more accurately reflect recycled water as a resource.

- Change Ironhouse Wastewater Treatment Plant (IWWTP) to Ironhouse Water Recycling Facility (IWRF)
- Change "ISD's infrastructure includes gravity and pressure pipelines, pumping stations, the Ironhouse Wastewater Treatment Plant (IWWTP) and lands on the mainland and Jersey Island that are used for effluent disposal." To "ISD's infrastructure includes gravity and pressure pipelines, pumping stations, and the Ironhouse Water Recycling Facility (IWRF)."
- Change "The IWWTP has a current treatment capacity of 4.7 mgd dry weather flow and 8.6 mgd maximum wet weather flow pursuant to California Regional Water Quality Control Board

Central Valley Region Order R5-2018-0090, adopted on December 7, 2018. The IWWTP's average influent rate from 2015 through 2017 was 2.4 mgd." to "The IWRf has a current treatment capacity of 4.3 MGD dry weather flow and 8.6 MGD maximum wet weather flow pursuant to California Regional Water Quality Control Board Central Valley Region Order R5-2018-0090, adopted on December 7, 2018. The IWRf 's average influent rate from 2015 through 2017 was 2.4 MGD."

- Change "ISD will continue to be responsible for providing adequate infrastructure for collection, conveyance, treatment, and disposal. This will require that the District implement phased improvements to its infrastructure, including its treatment and disposal facilities, pump stations, force mains, and other pipelines." To "ISD will continue to be responsible for providing adequate infrastructure for collection, conveyance, treatment, and recycling. This will require that the District implement phased improvements to its infrastructure, including its treatment and recycling facilities, pump stations, force mains, and other pipelines."

GOAL 4.9 Wastewater Services

- Change the Goal "Assure the provision of sewer collection, treatment and disposal facilities that are adequate to meet the current and projected needs of existing and future residents." To "Assure the provision of sewer collection, treatment and recycling facilities that are adequate to meet the current and projected needs of existing and future residents."
- Under Policies
 - 4.9.1 Change "Coordinate future development with the Ironhouse Sanitary District to ensure facilities are available for proper wastewater disposal." To "Coordinate future development with the Ironhouse Sanitary District to ensure facilities are available for proper wastewater management."
 - 4.9.3 Change "Encourage beneficial uses of treated wastewater, including marsh enhancement and agricultural irrigation. Such wastewater reclamation concepts shall be incorporated into resource management programs and land use planning." To "Encourage beneficial water reuse to improve regional groundwater quality. Water reclamation concepts shall be incorporated into resource management programs and land use planning."
 - 4.9.4 Water conservation may reduce the flow into the sanitary sewer collection system and Water Recycling Facility. However, this is related to expansion of these systems and not the rehabilitation and renewal of aging infrastructure and facilities. These capital costs will exist even if the flows do not change. Consider removing this statement from Policies as 4.9.1 already states that facilities will be available to accommodate sewer collection, treatment and recycling needs of future developments.
- Under Programs
 - 4.9.D and 4.9.E Change "Ironhouse Sanitation District" to "Ironhouse Sanitary District"

Thank you for your time and consideration of our comments.

Sincerely,



Tyson Zimmerman (on behalf of Ironhouse Sanitary District Board of Directors)
Assistant General Manager