Salinity-1/31/06
Workshop

City of Woodland

CITY COUNCIL 300 FIRST STREET WOODLAND, CALIFORNIA 95695 (530) 661-5800 FAX: (530) 661-5813

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VIA FAX AND E-MAIL

January 20, 2006

Ms. Selica Potter
Acting Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Subject: COMMENT LETTER – 1/31/06 BOARD WORKSHOP on Salinity

Dear Ms. Potter,

The City of Woodland (City) is pleased to see a joint workshop by the State Water Resources Control Board (SWRCB) and Central Valley Regional Water Quality Control Board (CVRWQCB) on salinity issues and appreciates the opportunity to submit comments.

The City operates a public water system, a municipal wastewater treatment plant, and a storm water collection system. Both non-point and point discharges from the City drain to the Tule Canal within the Yolo Bypass. Our drinking water source is groundwater with no supplement from surface water sources. The City is mostly residential, commercial, and light industrial, mostly warehouses. The City is located in the Sacramento River Basin, in eastern Yolo County where the soil in the area is saline, contributed by Cache Creek deposits. Naturally, the groundwater has high electrical conductivity (EC).[1] The shallow groundwater has EC concentrations above 1,500

[1] The City's groundwater supply also contains elevated levels of boron; however, the City's municipal and industrial use of water does not increase the boron concentration above the level in the source.

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µmhos/cm The City's water supply is pumped from deeper zones with EC levels between 500 µmhos/cm and 1,400 µmhos/cm

The City's most recent NPDES discharge permit for the wastewater treatment plant included an EC limit that the City could not meet without advanced membrane filtration. Upon appeal, the City was directed to complete a site specific study to determine an appropriate limit, although indications from the Board staff are that we will ultimately get a limit that again will require advanced membrane filtration for compliance. Indeed, the Chair of the Regional Board remarked during our permit hearing that all central valley towns on well water will eventually have to go to reverse osmosis to meet EC limits.

Communities relying on well water are likely to have elevated EC levels in their municipal water supply. While the water meets health standards, Board practice seems to be that it is not fit for discharge into the waters of the US. Aside from the wastewater NPDES permit issues, this makes normal soil dewatering operations or routine water system operations (fire hydrant flushing, lawn irrigation runoff, basement foundation drainage, runoff from car washes, etc) potential violations of the Porter-Colonge Act because of elevated EC levels. Storm drain basins with ground water infiltration are also potentially in violation. (The City has been denied several surface water discharge permit requests, both NPDES and Low Threat Discharge permits by the CVRWQCB because of EC.) The City also has an Interstate 5 freeway underpass, built by Cal Trans in the 1970's, that needs constant dewatering which may not be able to be permitted because of current policies. Additionally, the City may have to close a $3 million baseball complex because the fields are below the level of the surrounding ground, have been constantly dewatered for over 20 years, and may not be able to get a permit under current policies. Ironically, our storm water flows have historically been diverted by a local farm operation during the irrigation season to supplement their surface water diversions for crop irrigation.

City staff has reviewed the staff report and understands the salt accumulation and transport issues within the State. We do agree with the statement in the staff report that salt buildup and salinity control have posed little problem in the Sacramento River Basin. The City's receiving water, Tule Canal, drains to the Deep Ship Channel and the San Francisco Bay, bypassing the Delta Cross Channel and therefore not affecting the San Joaquin Valley or Southern California.

Furthermore, in regard to salinity, the water quality in the Tule Canal is typically worse than that of the City's uncontaminated groundwater discharge or the City's wastewater effluent. To impose an EC standard that the City cannot meet without advanced membrane filtration technology is a poor use of scarce energy resources. Furthermore, the salinity removal process (i.e., reverse osmosis or an equal process) is so expensive that if viewed from a statewide perspective, it would likely be found inconsistent with the State Board's Resolution 68-16:

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> *"WHEREAS the California Legislature has declared that....the disposal of wastes into the waters of the State shall be so regulated as to achieve highest water quality consistent with maximum benefit to the people of the State and shall be controlled so as to promote the peace, health, safety, and welfare of the people of the State..."*

The State Board is to be commended for addressing this issue; it needs to be addressed on a statewide basis. Advance membrane filtration is not the answer to the state's salinity issues. A comprehensive analysis of the causes and effects is required, along with societal costs and environmental impacts of the solution alternatives. Only when this is done in a comprehensive manner can the issues be clearly addressed and valid policy be developed. The City is committed to environmental stewardship, but excessive costs for marginal benefits masks the true issues and only gives an illusion of progress. The City urges the SWRCB and the CVRWQB to develop policies and guidance with long term salt disposal alternatives that are economically feasible and scientifically sound.

The City hereby respectfully requests the SWRCB and CVRWQCB to:

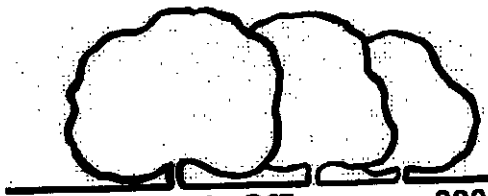
1) develop comprehensive statewide salinity policies and guidance with full cost, benefit, and environmental analysis of all potential alternatives (specifically including consideration of the impacts/benefits of advanced membrane filtration as a solution option-to clarify for policy makers the extreme environmental impacts and costs of such processes),
2) address situations with non-anthropogenic background salinity, and
3) include consideration of ocean disposal that occurs naturally in the San Francisco Bay.

Please do not hesitate to contact Mr. Gary Wegener at 530.661.5960 or Ms. Cathy Lee at 530.661.5885 should you have any questions.

Sincerely,

Matt Rexroad, Mayor
City of Woodland

cc: Mr. Richard Kirkwood, City Manager
Mr. Gary Wegener, Public Works Director
Ms. Cathy Lee, Associate Civil Engineer



City of Woodland

City Manager's Office 300 First Street Woodland, CA 95695

DATE: 1-23-06

Please deliver this FAX to:

COMPANY NAME: _____

ATTENTION: Belica Potter

TELEPHONE: _____

FAX NUMBER: 916-341-5620

This FAX originated by:

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COMMENTS: