

Salinity-1-31-06
Workshop

CITY of WILLIAMS

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

January 20, 2006

Re: Salinity Issues in the Central Valley

Dear Ms. Potter,

The City of Williams is located approximately fifty-eight miles north of Sacramento along the Interstate-5 corridor. The city has a population of just over 4,700 and operates its own water and wastewater treatment plants. We have fewer than 1,400 customers that we serve. While the city is experiencing growth, planning for, financing, operating and maintaining the public infrastructure to secure safe drinking water supplies and properly treating and disposing of wastewater effluent has become nearly impossible due to regulations on salinity.

The groundwater supply used to provide drinking water to our community is naturally high in salts. A creek runs through our town that is aptly named "Salt Creek". Over a hundred years of agricultural activity in this area may have further concentrated salinity in the region.

We are permitted to provide our customers with a higher level salinity in the drinking water supply than we can discharge from our wastewater treatment plant as effluent. Yet, it is the same water supply. How can these regulations be different and what is the goal of the regulatory bodies in not standardizing limits for salts?

Different divisions of the state permit drinking water and wastewater activities. This complicates matters for small communities with limited staff and expertise. Streamlining state operations to address clients' needs, such as establishing departments that address municipalities and holistically deal with permitting of water and wastewater operations, would greatly improve interaction and compliance.

Next there is an issue of compliance. Williams is facing millions of dollars of mandatory upgrades to our wastewater treatment plant. Further, we are being forced to secure a new source of drinking water supply over the next five years to comply with salt effluent mandates. There is a real question of whether we will be able to secure a new source of water supply and obtain the necessary water rights and transfers within the five year window. Our initial attempt to secure a new water source from local irrigation districts has not been favorable.

Other options regarding securing a new drinking water supply include reverse osmosis, electrodialysis, or water blending to reduce the salinity of our well water by mixing and diluting it with a new source supply lower in salinity. Should we be successful in obtaining a new source of water, then the blending option remains the most cost effective option. Reverse osmosis and electrodialysis are both cost prohibitive for small communities and create the additional problem

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of what to do with the by-product of these processes, brine. Normally brine is buried but in this area where the water table is high (four feet beneath the soil) burying brine would contaminate the water supply while shipping it elsewhere further increases production costs that would be passed on to our customers resulting in higher water and wastewater bills.

Our residential customers are among the poorest in the state with a median household size of 3.7, and an income of \$32,042. We have a modest commercial customer base and virtually no industrial customers. The local unemployment rate hovers at 15.9%. Paying for state mandated capital improvements that do not have long compliance schedules may bankrupt our community and drive away the new customers that we would need to spread the costs of the improvements thereby enabling us to comply with the salinity mandates.

How will the state be served if small communities are bankrupted? How will the state be served if multitudes of low-income families cannot pay for their drinking water or for their sewer services? What private firms will buy these small water and wastewater operations and what will they charge these low-income customers? Is the goal to shut-down all growth in the northern reaches of the state and the central valley to benefit continued growth in the southern portion of the state?

Given newly aired concerns of different flood scenarios in California, is unbridled growth in the southern portion of the state wise? How is the state addressing land use across the state and tying that to sustainability to achieve long-term policy needs? What gain is there by not providing compliance schedules that are tied to new sources of funding?

Williams understands the need to protect and even enhance our natural environment. We are taking measured steps to meet all of our obligations to provide the best quality of water to our customers and to meet regulatory requirements. As a small operator we have had to address all of our needs holistically and we believe that the state should begin the same approach in meeting its goals on reducing further concentrations of salinity across our great state.

We thank you for allowing us to provide our comments and we want to partner with you on solving these issues for ourselves, other communities and future generations. We welcome the opportunity to participate in round tables on the subject and in any other manner that may help to craft a comprehensive solution to these long-term public health, water quality and environmental policy issues.

Sincerely,



Virginia Frias, Mayor City of Williams

cc: Sam Aarstad, State Senator
Doug LaMalfa, State Assemblyman
Wally Herger, Congressman

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City of Williams

Fax

To: Selica Potter	From: Zanka Popovic, City Administrator
Fax: 916.341.5620	Pages: 2 to follow
Phone: 916.341.5600	Date: January 20, 2006
Re: COMMENT LETTER	CC:

Urgent
 For Review
 Please Comment
 Please Reply
 As Requested

• Comments:

Comment letter - 1/31/06
Board Workshop on
Salinity