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June 29, 1998

Lester Snow, Executive Director  
CALFED Bay-Delta Program  
1416 Ninth St., #1155  
Sacramento, California 95814

Re: Comments on Draft Programmatic EIS/EIR

Dear Mr. Snow:

Thank you for the opportunity to comment on CALFED's draft programmatic Environmental Impact Statement/Environmental Impact Report. The Sacramento River Watershed Program (SRWP) is a stakeholder-driven effort conducted under the auspices of the Sacramento Regional County Sanitation District, with funding primarily from the U.S. Environmental Protection Agency. It is driven by participation from stakeholders with vested interests in the water quality of the Sacramento River Watershed. These stakeholders include state, federal and local government agencies, suppliers of municipal drinking water, agricultural water users, environmental groups and interested members of the public.

A primary SRWP goal is to assess the water quality of the Sacramento River system, to report progress on these assessments to stakeholders, to discuss these assessments and their implications with stakeholders, and to recommend actions for improving water quality throughout the watershed. Clearly, this type of effort is integral to a larger effort to improve the ecological health and beneficial uses in the Bay-Delta.

This season marks the second year of SRWP's cooperative monitoring program in the watershed, developed through a stakeholder process and under the direction of the SRWP Monitoring Subcommittee. The SRWP monitoring program is integrated with ongoing monitoring by USGS NAWQA, DWR Northern District, Central Valley Regional Water Quality

Control Board, City and County of Sacramento, and the City of Redding. Samples will be gathered from more than sixty stations in the watershed, and tested for toxicity, toxic constituents (including metals and pesticides), pathogens, biological integrity, and other parameters. Data from these efforts will be used to design both future monitoring efforts and recommended actions.

With CALFED's interest in water quality assessment and action for the Bay-Delta and its tributaries, it seems critical that efforts of the SRWP and CALFED be carefully coordinated. In particular, any monitoring programs funded or conducted by CALFED should be integrated with the SRWP monitoring efforts to ensure that efforts are not duplicated.

Some stakeholder members of the SRWP Monitoring Subcommittee and Toxics Subcommittee also believe the EIS/EIR document should contain a comprehensive look at the potential water quality impacts of each of the preferred CALFED alternatives. Each preferred alternative will, in and of itself, influence numerous water quality parameters in the Delta, and these impacts must be described. The Subcommittee members believe it is not enough to simply examine the water quality impacts of CALFED's common programs or to limit the analysis to a small group of water quality parameters.

Some members of the stakeholder committee also believe it is important for CALFED to examine the impact of water quality on the biological resources of the Sacramento River Basin. Data from such an examination would be helpful in determining future resource allocations related to CALFED programs.

CALFED should ensure that water quality monitoring programs in the Bay-Delta and from other inputs to the Bay-Delta, such as the San Joaquin River, are conducted at least in similar fashion and scale to those conducted in the Sacramento River. In other words, while the SRWP must limit its efforts to monitoring sites directly in the Sacramento River watershed, SRWP Monitoring and Toxics Subcommittee members believe it is vital that similar monitoring programs be conducted more widely to develop an accurate assessment of water quality in the Bay-Delta system (e.g. San Joaquin watershed, other tributaries to the Bay-Delta).

Both CALFED and the SRWP are both undergoing rapid development; clearly, the two programs should maintain a link throughout this process to ensure coordinated efforts. To this end, we appreciate that a position on the CALFED CMARP steering committee has been granted to the SRWP. To strengthen our coordination, we also recommend a CALFED representative attend meetings of the Monitoring and Toxics Subcommittees.

Finally, the SRWP depends heavily on federal funding. The future of this funding is in question, and current funding is not considered by most subcommittee members to be adequate for a truly comprehensive monitoring program. CALFED should take steps to provide expanded, reliable funding for comprehensive watershed monitoring efforts in all watersheds with inputs to the Bay-Delta, including the Sacramento River Watershed Program.

Again, we appreciate the opportunity to comment on this important document, and look forward to working with CALFED to improve regional water quality. Please feel free to contact Tom Grovhoug (530/753-6400) or J.P. Cativiela (916/641-5039) if you have any questions about these comments.

Sincerely,



Sacramento River Watershed Program,  
Monitoring Subcommittee and Toxics Subcommittee

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Monitoring Subcommittee and  
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