

WATER QUALITY

WYME
Gen
CALFED should be aware of problems in north Bay Aqueduct with things such as organic carbon, turbidity, several metals and Delta smelt habitat in Baker Slough area which has restricted pumping in past.

WQ?
Gen
CALFED's water quality common program should also include the context of water rights. For resource categories the table should also include Water Quality as Resource category. San Francisco Bay, Sacramento-San Joaquin Delta and upstream river water quality should also be reviewed in detail in the EIR/EIS for the extent of the historical record. Comparison of the changes in water quality should be analyzed over the full historical period of the surface water hydrology using detailed water quality transport models.

WQTR

CALFED should do more than encourage voluntary compliance with BMP's, it should encourage regulatory agencies to enforce such compliance.

CALFED's water quality common program must be addressed as solvable problem, not something that must be tolerated and mitigated.

WQ
WQTR
While reviewing the subgroups write up there was some information which is not correct such as, "Chlorpyrifos should be removed from the list of parameters of concerns associated with urban runoff because it is not used in urban area". This is not true since lots of household cleaners use this as main ingredients. Things such as Ortho cleaner etc. Similar situations exists with respect to number of other organophosphorus pesticides such as diazinon, except that diazinon does not accumulate in sediments., but still cause aquatic life toxicity in storm water runoff from urban and agriculture areas.

WQTR
AKNS

- AKNS
- WQTR
- CMAP

WAD
APPRO

CALFED's Water quality program needs to adopt an Evaluation Monitoring approach for defining real water quality problems."

WAD
APPRO

CALFED should initiate pilot study to investigate the formation of bromate and other disaffection by-products at low bromide concentration. The study should aim to obtain a better understanding on the relationship between bromate and bromode concentration."

CMARP

INC
AGD

Surface Drainage Source Control project number one in Agricultural Drainage. The introduction to this section suggests implementing Integrated Pest Management (IPM) "especially for parameters of concern." In fact, the three currently used pesticides listed as parameters of concern are often employed as IPM tools for pest control. A more accurate statement of the project objective would be to implement BMPs within an IPM strategy to mitigate concerns related to pesticide use, off-site transport and aquatic toxicity. These BMPs should not be focused on Parameters of Concern, rather they should target agronomic practices which lead to aquatic toxicity endpoint of concern. A second statement in this section suggests that the project "should result in reduced pesticide loads applied to land." This would be true if implementation of an improved IPM approach eliminated unnecessary pesticide use (an outcome we would welcome). However, in some cases, the opposite may be true. We donot agree with the approach used to identify the Parameters of Concern, or the search for Acceptable Ranges for different pesticides. In our opinion, the draft listings of Parameters of Concern and Acceptable Ranges do not meet the standards of process or science that already exist for that purpose and are appropriate for these pesticides"

AVNS

WAD
APPRO

There need to be a monitoring program to monitor runoff from number of cities that contribute to Delta tributaries.

CMARP

WAD
APPRO