

TO: Rick Woodward

November 26, 1996

FROM: Jeanette Thomas

SUBJECT: Comments on the Draft Analytical Plan and Draft CALFED Water Quality Acceptable Ranges for Parameters of Concern

Draft Analytical Plan

In general, I believe you have taken the correct approach to studying each action item. However, after the 11/20/96 meeting, it is clear that the Group is not satisfied with the selection of the first ten action items to study and want all of the action items better defined and clarified. I feel any comments on individual action items in the Draft Analytical Plan must wait until the revisions have been made and accepted by the Group.

Actions

There were many excellent comments for clarifying the action items at the 11/20/96 meeting. [Concerns arose while the Agricultural Water Quality Sub-Team was ranking the action items over lack of detail in the descriptions of the action items. The Ag Group did suggest some revisions.] John Dickey has probably already brought them to the attention of the Water Quality Program Team.

Action base

Draft CALFED Water Quality Acceptable Parameters of Concern

If the numerical parameter on this table are also in a basin plan than those numerical parameters are acceptable.

I have concerns about using numerical parameters that are not in the basin plan. I need a better understanding of how these parameters will be used before I could consider accepting them.

I have concerns about using maximum contaminant levels (MCLs) specified in Title 22 of the California Code of Regulations which apply to drinking water (after treatment in the case of surface water) for raw water parameters. I agree that the closer the raw water is to the MCL the easier it is to produce drinking water that meets these criteria. With treatment, water above these criteria can also be acceptable.

The Ag Sub-Team wanted the Ag water parameters set for the most sensitive crop grown in the region. The Ag parameters are for the Delta only. Ag parameters need to be detailed for San Joaquin and Sacramento Rivers.

I don't think each Sub-Team used the same criteria for developing parameters of concern. Why are there no parameters for salinity, chlorides, nutrients, and SAR for the San Joaquin and Sacramento Rivers? They don't only cause problems for the Delta and the problems don't start in the Delta.

My suggestion would be to look at the parameters in two groups -

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basin plan parameters and non-basin plan parameters. This group could accept the basin plan parameters. A discussion should take place on those parameters included on this table, but not included in a basin plan and consensus reached on its inclusion for this table. Then this group needs to identify any areas which were not address (such as salinity for San Joaquin River).

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Process

General Comment:

I think it would be helpful to have written guidelines for each homework assignments.

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