

I

To: Dick Daniel

From: Judy Heath *JH*

Date: March 3, 1997

Re: Comments on ERPP

General Comments:

The Ecosystem Restoration staff and consultants are to be commended for undertaking a task which covers so many multiple and complex problems. Here are a few comments which can be handled without too much additional work.

*I-1* A publication date should be given when a document is referenced. For example on Page VI Volume II "Summary of Ecosystem Restoration Plans Pertaining to the Ecological Resources of the Bay-Delta and its Watershed" is mentioned with no date of publication.

There seems to be a lot of jargon used repeatedly such as program objectives, actions, elements, targets, visions, etc. Unless one memorizes the meaning of these terms, you can get lost. Maybe you have no choice in this matter.

There appears to be a lot of definitions repeated throughout. For example, the definition of adaptive management is repeated on Page *I-2* III and on Page *F-2* VI of Volume II.

*I-3* There seems to be some swipes at the California water management operations page 3 and 4. The ERPP calls it "incremental" management. On the face of the definition given in the ERPP it implies that California water management is not well coordinated or integrated and that CalFed will solve this.

*I-4* On the issue of Linkages with other Restoration and Water Management Programs Page 6, Volume, DWR needs to be mentioned as having water quality monitoring programs in the State Water Project and in the Bay-Delta.

*I-5* In the Dredging and Sediment Disposal section page 289, it needs to be mentioned that the Central Valley Regional Water Quality Control Board will have to be coordinated with to address their concerns of upland disposal of saline dredged material in a fresh water habitat.

In several of the actions mentioned in Volume I, it is stated or implied that CalFed would restore and maintain certain rivers by developing and implementing a comprehensive watershed management plan to protect the channel and preserve and restore the riparian corridor. In order to be in line with the proposed CalFed Watershed Policy, this statement needs to be revised to say that CalFed will assist and coordinate with local watershed

organizers, conservancies, agencies, etc. in the development and implementation of such plans to conform to CalFed Solution Principles..

Specific Comments (Contaminants section page 327):

- I-6 1. This section should be entitled "Water Quality" since this would more appropriately allow the stakeholders to link this material to the Water Quality Common Program and action items.
- I-7 2. The first sentence needs to be changed to include "drinking water".
- I-8 3. The second sentence should not say that CalFed will prevent or control levels of contaminants by controlling agricultural and urban point and nonpoint sources. CalFed has no statutory authority to control these substances. CalFed must rely on the State and federal agencies who have the statutory authority over these functions.
- I-9 4. On page 328 it is misleading to say that heavy metals do not break down organically. The breakdown of mercury in water to organic and volatile forms has been documented. The SWRCB has documentation on this issue.
- I-10 5. On page 328, other organic contaminants such as precursors to trihalomethane formation are of concern.
- I-11 6. On page 328, we should mention protozoans, along with bacteria and viruses as contaminants of concern. Specifically, the protozoans *Cryptosporidium* and *Giardia* have been found in the Bay-Delta and in the State Water Project and are thought to be from nonpoint sources in the watersheds to the Bay-Delta. These protozoans can cause human health concerns if exposure occurs.
- I-12 7. On page 330 it is stated that studies are needed to determine which mercury compounds lend themselves to bioaccumulation in the foodweb. I believe that methylated mercury compounds have been well studied as the main compounds which bioaccumulate in the foodweb. The SWRCB has documentation on this issue.
- I-13 8. Similarly on page 331 it is stated that studies are needed to evaluate opportunities for reuse of dredged material. I believe that the US Corps of Eng. has performed many studies on the beneficial use of dredged materials for upland disposal.
- I-14 9. On page 331 top paragraph, it should be mentioned that CalFed will also target the nonpoint sources and assist watershed management activities to help reduce the nonpoint sources of contaminants.
- I-15 10. On page 331, it is stated that CalFed will develop water quality and sediment quality objectives for contaminants of concern for which none have been set, to protect

aquatic life. This gets beyond the scope of our mandate. It should be stated that CalFed will work with the agencies having regulatory authority to develop objectives that conform to CalFed Solution Principles.

I-16  
11. On page 331, under Linkage to Other Restoration Programs, DWR should be listed along with the others for performing ongoing water quality and contaminant monitoring programs. There are other agencies performing these studies, including the Metropolitan Water District, City and County of Sacramento, UCD, conservancies, etc. There is a 1993 Compendium of Delta Water Quality Studies produced by DWR which lists all those agencies engaged in water quality monitoring .

I-17  
One of the main issues with recreational activities is the nonpoint source releases of pathogens from outhouses, picnic areas, discharges from boats, etc. This should be considered when listing human disturbance contaminants on page 333.

cc: Rick Woodard  
Steve Yaeger