

DEPARTMENT OF FISH AND GAME

601 LOCUST STREET
REDDING, CA 96001
(916) 225-2300



August 15, 1997

- Statement
Removed

Mr. Rick Woodard
CALFED Bay- Delta Program
1416 Ninth Street, Room 1148
Sacramento, California 95814

Dear Mr. Woodard:

The Department of Fish and Game's (Department) Northern California-North Coast Region office in Redding, California, has briefly reviewed the "CALFED Water Quality Program Component Report Draft August 1997". We are very concerned over statements made in the document on pages E-6, Section: Prioritizing Problem Areas and 5-1, Section: Water Quality Problem Areas. These sections both state: "Defining what constitutes a 'problem' is a controversial and debatable issue. Very few of the parameters of concern have been studied sufficiently to understand their fate, transport and impact on beneficial uses of water. If a parameter is measured against an existing objective, criteria or standard a decision must be made 1) whether the standard is appropriate, 2) what the standard is meant to protect, and 3) what level of exceedance is relevant (e.g., duration, season, geographic location, etc.). For example, an exceedance of copper in the Upper Sacramento River during the fall-run chinook salmon juvenile outmigration period might be devastating to the population however, during other times of the year (when fall-run are not present) there may be virtually no biological impact. For some parameters such as temperature and salinity extensive data has been collected...."

- studies

This statement is entirely incorrect. There are sensitive life stages of salmon present in the Upper Sacramento River below Keswick and above Red Bluff during all months of the year. Winter-run salmon (an endangered species) are present in their most sensitive life stage, the incubation period, from April through September. Spring-run salmon have eggs incubating in the river from August through December. Late fall-run salmon are incubating from January to June and fall-run salmon incubation occurs October through March. Steelhead trout also use the Sacramento River for incubation during the winter months of the year. Juvenile rearing and outmigration for the various salmon runs also occur throughout the year. Additionally, there have been extensive data collected and toxicological studies completed which show that exceedances of the existing basin plan standard for copper for the Upper Sacramento River are deleterious to the beneficial uses of salmon spawning and incubation.

For the above reasons, the Department strongly suggests you do not use this copper criteria as an example of a problem which is "debatable" or make the incorrect and inappropriate statement that, "...during other times of the year (when fall-run are not present) there may be virtually no biological impact...."

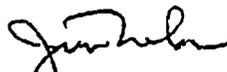
Department staff have not had time to thoroughly review this document and may have additional future comments. If you have any questions or comments regarding this matter, please contact Environmental Specialist III Jane Vorpapel at (916) 225-2124.

D - 0 3 3 9 6 0

Mr. Rick Woodard
August 15, 1997
Page Two

These comments are being sent via Mr. Pete Chadwick per Department policy. They will be sent via e-mail to meet the comment period deadline. A hard copy is to follow.

Sincerely,


for Richard L. Elliott
Regional Manager

cc: Ms. Jane Vorpapel
Department of Fish and Game
601 Locust Street
Redding, California 96001

Mr. Jim Pedri
Central Valley Regional Water
Quality Control Board
415 Knollcrest Drive, Suite 100
Redding, California 96002