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December 2, 1997

Ms. Leslie Grober
Central Valley Region
Regional Water Quality Control Board
3443 Routier Road
Sacramento, CA
IMS G-18

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To <i>Sarah Holmgren</i>	From <i>Judy Healy</i>
Co.	Co.
Dept.	Phone #
Fax #	Fax # <i>CURW&P</i>

Response to CURW&P

Subject: Response to Comment on CALFED Draft Water Quality Program Component Report

Dear Ms. Grober:

Thank you for your comments regarding Section 4 of the Component Report that addresses sources and loadings to the Delta. Specifically you were concerned about the estimates of TDS Table 4-8 and the need to better define the basin concept and account for background loads. With respect to the loads estimates, you indicate that the data you are familiar with suggests that the annual load at Vernalis on the San Joaquin River is about 1.5×10^9 (trillion) pounds per year. On the basis of daily monitoring data (TDS) provided to us by DWR, and daily flow data from the USGS, we estimated that the annual load was about 2.2 trillion lbs/yr. This latter estimate includes a number of assumptions required to combine the relatively sparse water quality data with the almost continuous flow record. This estimate was erroneously entered as an agricultural load in Table 4-8, whereas it was intended that loads estimated using in-river data would represent basin loads. Thus, we would agree that your estimate of 1.5 trillion pounds per year is the right order of magnitude, and is the best we can do with this data.

Let me now address your second point, what is meant by basin loads? The intent was to use outfall or drain data wherever available to estimate activity-specific loads (e.g., agricultural or urban) and to use river data to estimate the total basin loads. Ideally then, the basin loads and the sum of the individual activity-specific (or source) loads could be compared for reasonableness (really an order of magnitude check). The estimate for the basin load in Table 4-8 (0.7×10^9) is not correct and should have been based on the calculations described above which yielded 2.2 trillion lbs/yr. and perhaps the 1995 CUWA report (Study of Drinking Water Quality in Delta Tributaries) which yields about 3 trillion lbs/yr.

You are correct that, ideally, we would like to distinguish background loads from loads associated with human activity and we will certainly qualify the data so the reader is aware that load estimates include background. We do feel that isolating background from man-made loads is a major research effort and outside the scope of the requirements of the PEIS/EIR.

CALFED Agencies

California
 The Resources Agency
 Department of Fish and Game
 Department of Water Resources
 California Environmental Protection Agency
 State Water Resources Control Board

Federal
 Environmental Protection Agency
 Department of the Interior
 Fish and Wildlife Service
 Bureau of Reclamation
 U.S. Army Corps of Engineers

Department of Agriculture
 Natural Resources Conservation Service
 Department of Commerce
 National Marine Fisheries Service

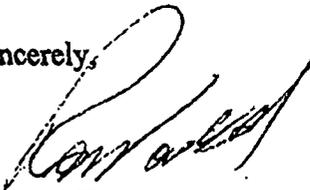
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You also questioned the estimate for selenium in Table 4-6, suggesting that the estimate of 2,000 lbs/yr. for the San Joaquin Basin seemed low. Unfortunately, the Component Report did not include our latest estimates, which were about 9,000 lbs/yr. This estimate is also more in agreement with data published in the CVRWQCB 1996 Agricultural Drainage Report for the Grassland Area.

In summary, our work continues to progress and we will make every effort to include the most complete information in the programmatic EIS/EIR. Thank you for your constructive comments.

If you have further comments, please contact Judy Heath at CALFED Bay-Delta Program, Water Quality Unit, 1416 9th Street, Room 1148, Sacramento, California 95814, or phone (916) 653-2994.

Sincerely,



Richard Woodard
CALFED Bay-Delta Program

Enclosures

JHeath:PBudzinski