

# **COMMENTS**

## **STATE DEPARTMENT OF HEALTH SERVICES**

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April 21, 1999

Steve Ritchie  
Chief Deputy Director  
CalFed Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

Dear Mr. Ritchie:

The purpose of this letter is to follow up on the March 29, 1999 meeting of government agencies involved with the CalFed program. At that time you asked agency representatives to provide information on their roles with water quality issues and to comment on the "Water Quality Technical Appendix" and the draft "Bundles of Early Implementation Actions", especially the priorities assigned to the actions recommended in these documents. The following responses pertain to the responsibilities and priorities of the State of California's Drinking Water Program (DWP).

**Agency Role** - The DWP is responsible for establishing and enforcing policies and regulations pertaining to public water systems in California. This includes developing standards for drinking water quality, treatment, and distribution, as well as evaluating sanitary hazards to sources of drinking water supply. The DWP has no direct authority to enforce the correction of the latter, but acts with water systems and other regulatory agencies in developing actions and programs to abate situations that negatively impact the quality or safety of drinking water sources.

**Draft Documents and Action Priorities** - DWP staff participated in the preparation of the "Water Quality Technical Appendix" and support its recommendations. The "Bundles of Early Implementation Actions", however, do not entirely reflect these recommendations or the relative priorities we assign them. We offer the following comments on the latter document:

1. Action Item 36 is, from our point of view, the most critical item described in the document. It is described as a comprehensive study of the sources of contaminants that are of concern in drinking water systems, and of the relative magnitude of those

sources. Such a study could, if done properly, provide a means of determining which corrective actions will be most effective in abating drinking water quality problems, thereby allowing the informed prioritization of such actions. It is of some concern, therefore, that only \$600,000 is set aside for conducting the study. Although we have not seen the scope of work, our experience leads us to believe that this amount will not be adequate. We recommend that the scope of work be reexamined and, if necessary, expanded to provide reasonably accurate estimates of contaminant loads from various sources of pathogens, organic carbon, bromide, nutrients, dissolved solids, etc.

2. Action Items 13, 15, 34, 35, and others involve the creation of wetlands habitat. It should be noted that each of these projects will probably increase the organic carbon loading for the waterway in which it is located. Each of these projects should, therefore, include an assessment of this impact. In addition, Action Item 33 should address the cumulative impacts of all such projects on the delta as a drinking water source. Also, we recommend that Action Item 33 be incorporated into Action Item 36 to avoid redundancy.
3. Action Item 25 is a restoration project for the portion of the Barker Slough watershed immediately tributary to the North Bay Aqueduct diversion. It should be noted that, even if the proposed actions correct current problems with storm-related excessive concentrations of organic carbon and turbidity, the overall water quality at that location would still be relatively poor. Also, long-term prospects for the diversion are compromised by plans for upstream urban development and associated discharges. We recommend, therefore, that the project include a feasibility study for moving the point of diversion to a more appropriate location.
4. The "Water Quality Technical Appendix" includes the following recommendations that we consider appropriate for inclusion as early action items:
  - Conduct a study to identify effective, practical ways to control algae growth in Clifton Court Forebay and Bethany Reservoir.
  - Conduct a study of the water quality impacts of the City of Tracy and Discovery Bay sewage treatment plant discharges on the Delta-Mendota Canal (DMC) and the Old River channel, respectively.

- Develop and implement a program to curb the direct introduction of human wastes into delta waterways as a result of recreational boating.
- Develop and implement best management practices for controlling discharges from animal enclosures.
- Design and build hydraulic structures to prevent the most significant known sources of contamination from directly entering State Water Project canals and reservoirs.

As a final note, we understand that the Regional Water Quality Control Board does not consider the lower San Joaquin River to be a source of domestic supply. Current hydrologic modeling by the Department of Water Resources, however, indicates that the DMC receives the majority of its water from the lower San Joaquin River under certain flow conditions. The City of Tracy uses the DMC as its source of drinking water. In addition, there are long-range plans to interconnect the California Aqueduct and the DMC above and below the pumping facilities for these conveyances. In view of the above, we recommend that CalFed consider whether the current designation of the lower San Joaquin River as a non-drinking water source is appropriate.

I hope these comments are helpful. Please contact me if you have any questions.

Sincerely,

David P. Spath, Ph.D., P.E., Chief  
Division of Drinking Water and  
Environmental Management

**WATER QUALITY POLICY GROUP  
(Proposed Membership)**

**AGENCIES**

**A. J. Yates - Department of Food and Agriculture  
Ryan Broddrick (or replacement) - Department of Fish and Game  
Dave Spath - Department of Health Services  
Jean-Mari Peltier - Department of Pesticide Regulation  
Felicia Marcus - Environmental Protection Agency  
Gary Carlton - Central Valley Regional Water Quality Control Board  
Loretta Barsamian - San Francisco Regional Water Quality Control Board  
Walt Petit - State Water Resources Control Board  
Mike Spear - Fish and Wildlife Services  
J. R. Flores - Natural Resources Conservation Services  
Tom Hannigan - Department of Water Resources  
Maria Rea - Environmental Protection Agency**

**REPRESENTATIVE GROUP OF STAKEHOLDERS**

**Richard Denton - Contra Costa Water District  
Amy Fowler - Santa Clara Valley Water District  
Tom Zuckerman -  
Bill Jennings - DeltaKeeper  
Mike Lozeau - San Francisco Baykeeper  
Dan Nelson (or Joe McGahan or Bill Johnston) - San Luis & Delta Mendota Water  
Authority  
Jerry Troyan - Sacramento Regional County Sanitation District  
Roy Wolfe - Metropolitan Water District of Southern California  
Marguerite Young - Clean Water Action  
Kati Beuhler (or Kathy Mannion) - Western Growers Association**