April 21, 1999

EPA comments on drinking water source protection activities in bundles:

We have reviewed the bundles (March 22, 1999 version) with respect to early implementation activities to protect drinking water sources. We considered the CALFED Water Quality Program document (revised draft, February 1999) as the basis of these activities, determined which of the Program Actions were necessary and appropriate for early implementation, then compared this list with the bundles as provided.

Three actions listed in the March 22 bundle document are of highest priority for early implementation. These are #36 aquisition of contaminant loadings, #33 TOC evaluation and #6 Veale Tract drain relocation. We believe they should be first among the bundle actions to be funded and implemented.

Our consideration of #36 is that information on sources and their loadings of the constituents of concern for drinking water is currently lacking, but absolutely necessary before prioritization of the various remedies. Without these data, we cannot say what mitigations need to be done first and what is likely to result from mitigation actions. Both data acquisition and analysis are required. This activity may require substantially more than the $1.5M listed for it.

With respect to #33, we view this activity to include assessments of downside impacts from TOC releases within the Delta, particularly those arising from wetlands creation and operation. It is essential that every wetlands project be tasked with an adequate analysis of the implications for drinking water quality from TOC discharges. The $5.0M listed for it should be more than adequate.

Project #6 will provide valuable data on the benefits from relocating specific agricultural or wastewater drains that highly impact water quality near a drinking water intake. It will be a useful test case for other possible relocations.

Beyond these critical activities, we reviewed the other actions in terms of their importance to protection of drinking water sources. In order of their presentation in the March 22 bundle document, they are discussed below.

#4 requires as a component analysis in the planning phase of impacts to drinking water quality for pathogens, nutrients, salinity and TOC. These results should be used in evaluating and choosing designs.

#7,8,9 will be useful for improving water quality and should be initiated in the early phase.

#11, study of non-seawater sources of bromide, can be deleted. Evidence brought forward recently indicates that non-seawater sources of bromide are unlikely to be of importance.

#16 must include as a component analysis of impacts to drinking water quality for pathogens,

nutrients, salinity and TOC. These results should be used in evaluating the feasibility of this project.

#25, Barker Slough watershed restoration, should include also an analysis of moving the North Bay Aqueduct intake to some other site. It may be preferable in the long run to move the intake rather than attempt restoration of the watershed in order to provide better water quality. If not included in #25, this study should be implemented separately as an early phase activity.

We also believe the following activities should be developed and initiated in the early phase.

Study: Algal growth and feasibility of control in Clifton Court and South Bay Aqueduct. Impairment of export water by algae requires substantial treatment and limits other treatment approaches to provide safe drinking water and meet regulatory requirements. $0.5M, led by WQ.

Study: Feasibility of controling agricultural discharges and stormwater flows into the California Aqueduct and Delta-Mendota Canal. Impairment of export water below Clifton Court must be controled to maximize any benefits from improvements to water quality at the pumps. $1.0M, led by DHS and DWR.

Establish a drinking water beneficial use designation for the lower San Joaquin River. This will likely lead to a determination of impairment and opportunities to control discharges. $0.5M, led by RWQCB#2.

Implement requirements for discharger monitoring of constituents of concern for drinking water beneficial uses (pathogens, nutrients, salinity and TOC). This will provide data on loadings consistent with project #36. $0.1M, led by SWRCB.

Develop and implement BMPs to reduce contamination from dairy, fish farm and other animal feeding operations (AFOs). These are considered significant sources of pathogens and nutrients. Their control will improve treatability of drinking water. $0.5M, led by EPA.

Develop and implement education and control measures to minimize waste discharges from recreational activities (boating) in the Delta. These are considered significant sources of pathogens and nutrients. Their control will improve treatability of drinking water. $0.5M, SWRCB lead.