

CALFED's Water quality program needs to adopt an Evaluation Monitoring approach for defining real water quality problems."

CALFED should initiate pilot study to investigate the formation of bromate and other disafection by-products at low bromide concentration. The study should aim to obtain a better understanding on the relationship between bromate and bromide concentration."

Surface Drainage Source Control project number one in Agricultural Drainage. The introduction to this section suggests implementing Integrated Pest Management (IPM) "especially for parameters of concern." In fact, the three currently used pesticides listed as parameters of concern are often employed as IPM tools for pest control. A more accurate statement of the project objective would be to implement BMPs within an IPM strategy to mitigate concerns related to pesticide use, off-site transport and aquatic toxicity. These BMPs should not be focused on Parameters of Concern, rather they should target agronomic practices which lead to aquatic toxicity endpoint of concern. A second statement in this section suggests that the project "should result in reduced pesticide loads applied to land." This would be true if implementation of an improved IPM approach eliminated unnecessary pesticide use (an outcome we would welcome). However, in some cases, the opposite may be true. We donot agree with the approach used to identify the Parameters of Concern, or the search for Acceptable Ranges for different pesticides. In our opinion, the draft listings of Parameters of Concern and Acceptable Ranges do not meet the standards of process or science that already exist for that purpose and are appropriate for these pesticides"

There need to be a monitoring program to monitor runoff from number of cities that contribute to Delta tributaries.

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1. The State Water Project Sanitary Survey, recently completed by the Department of Water Resources, does identify the waters of North Bay Aqueduct as being subject to degradation by organic carbon, metals, turbidity, and pathogens.
2. The reference to water rights connection to water quality is not clear. Historical water quality data will be reviewed and evaluated in the CALFED process, though decisions have yet to be made on how much of this will be accomplished in the Programmatic stage of the process.
3. A number of water quality actions identified by the Water Quality Technical Group do involve BMP's; therefore it is likely that CALFED will be acting to encourage their development and implementation.
4. It is CALFED's plan to solve water quality problems that are reasonably correctable, realizing that it may not be possible to completely eradicate all problems. Until proven otherwise, however, we will proceed on the assumption that all identified problems are correctable.
5. The Department of Pesticide Regulation was the source of the statement that Chlorpyrifos is not available for domestic use. We will verify this information with DPR.
6. It is not clear what is meant by "Evaluation Monitoring Approach". We need to identify the party making this comment and seek clarification.
7. Because funding now appears to be unavailable for performance of any work other than ecosystem restoration activities, and because a study of this nature would have no direct ecosystem benefits, it is unclear how such a project could be sponsored by CALFED anytime soon. The problem is that the results of the study would be needed in the selection of a Preferred Alternative in the Programmatic stage of the process. Urban stakeholders are unlikely to be pleased to learn projects serving their interests are not implementable at this juncture of the CALFED process.
8. The context within which these comments were made is not clear. In order to respond adequately, we need to see the entire text and learn from whom the comments originate.
9. There already are programs to monitor storm water runoff from cities in the Delta watersheds. Over the course of program development we will be collecting and evaluating available data, and identifying any information gaps, though this will probably not happen at the Programmatic stage of the process.

I have never before seen some of these comments. The Water Quality Program must be provided with the complete texts of all communications that affect content of the program. Some of these have significant implications for the program.