



Cal/EPA

State Water
Resources
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MEMORANDUM

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Pete Wilson
Governor

TO: Rick Woodard
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Gerald W. Bowes

FROM: Gerald W. Bowes, Ph.D., Chief
Standards Development Section
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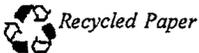
DATE: MAR 2 1 1997

SUBJECT: CALFED BAY-DELTA PROGRAM/STATE WATER RESOURCES
CONTROL BOARD: WATER QUALITY ISSUES OF MUTUAL
INTEREST

Thank you for meeting with us on February 26, 1997 to discuss and clarify water quality issues that might be of potential interest to both the CALFED Program and our agency. I previously attended two CALFED overview meetings but the nature and dimensions of the water quality part of the Program had continued to elude me. However, I did detect some sense of urgency for getting many projects underway soon, once the extent of funding and its availability became known.

My intent in bringing you, Gail Linck, Bill Ray, and me together was threefold: (1) to clarify the water quality aspect of the Program, including goals, time frame, and budget; (2) to determine how much overlap there might be in certain water quality concerns between the CALFED Program and the State Board's water quality standards development programs; and (3) if there was substantive overlap, to explore the possibility of active State Board participation in the development and management of key water quality projects for the CALFED Program.

I want to emphasize as I did at the meeting that our discussion was focused on those areas where my staff and I have responsibilities at the State Board. Clearly there are other subjects of potential overlap and over a period of time all will be discussed by appropriate State Board and CALFED representatives.



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Following is my understanding of the broader aspects of the CALFED Program and specific mutual interests that came to light as a result of meeting with you. Suggestions are made for potential active State Board participation which realistically would have to be commensurate with the level of Program support.

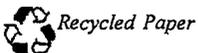
A. CALFED Scope, Schedule, and Funding

We are in full agreement that the scope, duration, and budget of the CALFED Program is so extensive that State agency leadership has to be established in many areas including those described on the following pages.

1. Scope. The scope of the CALFED Program, including its three phases, has been described in several program publications, including the February 1997 CALFED Bay-Delta Program Briefing Packet. This description will not be repeated here except for a listing of the Program's four objectives:
 - (a) Provide good water quality for all beneficial uses.
 - (b) Improve and increase aquatic and terrestrial habitats and improve ecological functions in the Bay-Delta to support sustainable populations of diverse and valuable plant and animal species.
 - (c) Reduce the mismatches between Bay-Delta water supplies and current and projected beneficial uses dependent on the Bay-Delta system.
 - (d) Reduce the risk to land use and associated economic activities, water supply, infrastructure, and the ecosystem from catastrophic failure of Delta levees.

As you mentioned today, the first objective which focuses on water quality, has been the subject of recent comments; specifically, that it has been overshadowed by the others, with relatively little attention being paid to it.

2. Schedule. The CALFED Program is planned to run for several decades. The water quality activities are expected to continue through this period.



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3. Funding. Proposed federal funding is \$143 million each year for three years, beginning with FFY 1998 (October 1, 1997). The proposed budget for water quality projects (objectives a and b above) in FFY 1998 is at least \$21 million. This budget would be augmented by State funds, e.g., Proposition 204 funds for watershed management plans and studies.

B. Specific Mutual Water Quality Interests of CALFED and the State Board

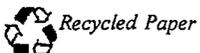
1. Plan for Quality Assurance (QA) Program integrating all CALFED water quality-related projects.

As you indicated, this must be done first, i.e., before any projects are initiated. The Plan must be developed by a well-qualified QA Program Manager in a designated lead agency with supporting staff, perhaps from participating agencies.

2. Issues identified by public advisory task forces for proposed Inland Surface Waters Plan and Enclosed Bays and Estuaries Plan.

The State Board convened several task forces to address issues concerning the statewide control of toxic pollutants in non-ocean surface waters. These task forces identified numerous issues that are relevant to the goals of the CALFED Program. These issues include the following:

- (a) Develop technical guidance for site-specific objectives studies. Statewide application of water quality standards may result in situations where more or less stringent water quality objectives would be appropriate for certain water bodies. Technical guidance is needed for deriving water quality objectives for particular sites that differ from the numeric standard that applies statewide.
- (b) Develop water quality objectives for chemicals of concern. Like CALFED, the task forces identified agricultural chemicals as toxic pollutants that have a high potential for adversely affecting the State's waters.



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Further studies to establish safe levels for these and other chemicals of concern are needed.

- (c) Promote implementation of toxicity objectives. Statewide implementation procedures for toxicity control is an important component of water quality protection. Investigations on reducing toxicity test variability, including the establishment of additional test acceptability criteria, would promote toxicity control efforts.
- (d) Develop biocriteria. In situations where water quality objectives may be lacking or insufficient, biocriteria could be developed and used to assess water quality conditions. These narrative descriptions of the biological integrity of aquatic communities supplement chemical-specific and toxicity objectives. Little work has been done on biocriteria at the State level.

3. Monitoring programs that will be effective in measuring whether or not the CALFED projects met their goals.

The focus here contrasts with the often-criticized approach of "monitoring for monitoring's sake", where most of the effort is devoted to data collecting and minimal effort to data evaluation. The CALFED Program places high priority on data evaluation.

Monitoring will only be successful in measuring whether or not projects have met their goals if two steps are taken: (1) establish hypotheses for all projects where monitoring is intended to be a part of the project; and (2) design the monitoring such that the monitoring data can be used to prove or disprove the hypotheses.

4. Centralized Quality-Assured Data Collection and Management System.

Once initiated, the considerable number of CALFED-supported projects will produce an overwhelming amount of data over the decades long course of the program. Without constant attention to assuring data quality and the setting up of a central data



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repository which can be used as a tool to evaluate data quality, the program has a high likelihood of producing a large amount of information of various quality stored in a variety of locations. The success of water quality projects of the CALFED Program, and even the success of a large part of the Program itself, would be difficult to evaluate without such a central, high quality system.

C. Suggestions for State Board Active Participation (i.e., distinct from sitting on coordinating committees)

The State Board and its staff could play lead or significant roles in all of the areas described above. In addition, there may be an opportunity for Ocean Standards Unit staff to participate with respect to evaluating Bay-Delta water impacts on near coastal waters. We agreed to discuss this subject in more detail later.

Any potential significant movement by us into the CALFED Program would need extensive review within our agency. An internal meeting has been set up here for March 21, 1997 to discuss the relative roles of the State and Regional Boards in the CALFED Program. I will be sending a copy of this memorandum forward for review and comment, and I hope the ideas expressed herein would be discussed at the March 21 meeting.

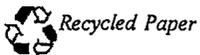
I would like to explore these concepts with you further to determine the extent to which the State Board's standards development programs, including the quality assurance program, might become more active participants in the CALFED Bay-Delta Program.

My telephone number is 657-1029 (FAX 657-2388).

cc: Jesse M. Diaz, Chief
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Rick Woodard

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