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April 4, 1997

**Sacramento Regional Wastewater Treatment Plant**

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Mr. Rick Woodard  
Water Quality Program Manager  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

Dear Mr. Woodard:

**Subject: Comments on Priority Water Quality Subject Areas and Recommended Selection Criteria for Early Project Proposals for Ecosystem Restoration**

**Board of Directors  
County of Sacramento**

Roger Dickinson  
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Muriel P. Johnson  
Dave Cox  
Don Nottoll

**City of Sacramento  
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**Warren Harada  
Agency Administrator**

**Robert R. Shanks  
District Engineer**

**Cheryl E. Cresson  
District Manager**

**Wendell Kido  
Plant Manager**

As requested during the meeting of the CALFED Water Quality Technical Work Group (WQTWG) on April 1, 1997, the Sacramento Regional County Sanitation District (District) is providing comments on the document given to us at that meeting.

**Priority Water Quality Subject Areas**

The District has comments on five of the seven subject areas as follows:

Item 1. The District strongly endorses the proposal to establish a Comprehensive Water Quality Monitoring and Assessment Program as described. The District has acted on its firm belief in the need for such programs with high quality data by first initiating the Coordinated Monitoring Program in the Sacramento metropolitan area in 1992, and second by getting funding from Congress to begin the Sacramento River Toxic Pollutant Control Program (SRTPCP) in 1995. The SRTPCP has as its first primary objective the design and implementation of a coordinated water quality monitoring program throughout the Sacramento River watershed. Committees of stakeholders have been meeting since April, 1996 to initiate this effort. Final details of the first year of monitoring will be available later this month. It is significant to note that this monitoring program will include biological assessment work by the California Department of Fish and Game, the Department of Water Resources, and the U. S. Geological Survey, as well as ambient toxicity work supported by the Central Valley Regional Water Quality Control Board, U.C. Davis, and the California Department of Pesticide Regulation.

in accordance with

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Item 3. The reduction of pollutants in urban storm runoff has already begun on both national and local levels. Achieving significant reductions will require public education programs as well as technical solutions and will not be easy. The District and a number of other public agencies are presently monitoring for several pesticides, metals, and other constituents to understand better how to manage runoff quality. To date, nutrients, salinity and turbidity in urban runoff have not been considered as having beneficial uses of water. Therefore, a cost-benefit analysis should be performed on any alternatives that are developed for these parameters. Finally, "dissolved oxygen" is mentioned; should this have been "oxygen-demanding materials"? *merged*

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Item 6. The District also strongly supports the concept of coordination of watershed water quality activities related to toxic contaminant reduction and development of watershed-wide solutions to water quality problems affecting the ecosystem. This is the same concept the District had in mind when it initiated the SRTPCP mentioned above in Item 1. *you can't do that?*

Item 7. The District recommends that this item, relating to the reduction of mercury, be given high priority among water quality issues because of concerns regarding bioaccumulation of mercury in the ecological food chain. The serious nature of current conditions is underscored by recent public health warnings on fish consumption due to mercury concentrations in fish tissue. *✓*

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**Recommended Project Selection Criteria**

*- Project Selection*

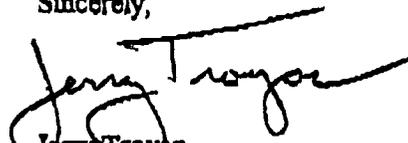
The District has the following comments on the project selection criteria listed:

- The District supports adding Water Quality-Specific Selection Criteria because physical habitat characteristics by themselves will not protect the biological resources in the Delta if water quality is not adequate.
- In the fourth bullet item under the heading of Water Quality-Specific Selection Criteria, the word "numeric" should be eliminated; it makes the sentence more restrictive than it should be because some of the existing regulatory criteria used by the Regional Water Quality Control Boards are narrative. Criteria for toxicity are a prime example of this situation.

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The District is pleased to provide these comments and to have been invited to participate in this important process.

Sincerely,



**Jerry Trovan  
Associate Civil Engineer**

JTrovan/CALFED