

Robin Jenkins
4/25 for your files
Rick W

Digest of comments on document "Priority Water Quality Subject Areas and Recommended Selection Criteria for Early Project Proposals for Ecosystem"

Cindy Darling April 9, 1997 E-mailed Chris Foe soliciting input from Pollutant Work Team on criteria for water quality project selection.

Chris Foe (Central Valley RWQCB)

Chris writes to the Pollutant Work Team of the Ecosystem Roundtable:

"CALFED is composed of 4 groups including an Ecosystem Water Quality and Ecosystem Restoration Group. A number of you participate in the water quality scoping efforts to develop a list of constituents of concern that exceed Basin Plan water quality objectives or other criteria and actions to reduce or eliminate the exceedances. Little discussion occurred at the scoping meetings of the ecological significance of the exceedances. Conversely the Ecosystem Restoration Group divided the Central Valley and Delta into habitats and key species and are recommending a series of actions to attempt to restore them. Unfortunately, the Ecosystem Restoration Group did not consider contaminants. She has asked the PWT to review the Ecosystem Water Quality groups recommended priority actions and suggested criteria for evaluating the proposals to ensure they are complete. CALFED hopes to release the RFP in early May. Hence, our comments are only of value if we get them to Cindy pronto."

The following are responses to the Foe e-Mail Message:

Samuel N. Luoma, USGS April 11, 1997:

Priority subject areas:

1. "Reduction of" implies it is known what the problem is and how to fix it. Reword to "Establish the ecosystem significance of the pesticides Chlorpyrifos, Carbofuran, Diazinon, etc, and develop cost effective mechanisms to reduce discharges from significant sources".

"Establish the significance of pollutant inputs from urban storm runoff to the Delta and Bay, especially considering Diazinon, etc. Verify which pollutants create the greatest threat to significant species, establish which sources of urban runoff are the most important and develop, test and monitor cost effective mechanisms...

"Determine if reduction of copper, zinc, and cadmium inputs from abandoned and inactive mines.... would be effective in improving survival of critical species in the Sacramento, Delta and North Bay ecosystems. Reduce inputs at places and times that would improve the survival of critical species."

"Establish the significance of selenium from subsurface agricultural drainage in Grasslands to ecosystem of the SJR, Delta and North Bay. Establish the relative importance of other sources including internal sources from historic contamination, and

establish which species are most threatened by existing or future contaminants. Use this knowledge to determine how to most effectively remove the selenium threat to the critical species.”

“Coordination of watershed water quality activities related to toxic contaminant reduction and development of watershed-wide solutions to water quality problems affecting the ecosystem.”

“Establish the significance of the several possible sources of mercury contamination in impaired water bodies, as defined through the CALFED Water Quality Program; consider and compare inputs from specific abandoned and inactive mines, gold mining activities and internal cycling as possibilities. Determine which of the critical species in the Bay ecosystem (or which resources) are most threatened by mercury contamination and develop a cost-effective program that reduces mercury contamination and threats to these species by attacking the most significant sources of the problem.”

2. CALFED must believe focused science will help solve the problems. Physical restoration is useless without improved water quality, and the public knows it.

Bob Spies - Applied Marine Sciences April 11, 1997

There is as yet no systematic approach to the problems of the estuary, and we are preparing to start spending money to achieve quick fixes. The notion appears to be that we can skip the science and go directly to engineering. He proposes:

- High level independent scientific and engineering expertise should be enlisted to identify a framework for proceeding with restoration. The plan should relate eco risk from toxics.
- Develop administrative structure independent of government agencies.
- Rules and scientific leadership that recognizes the need for science.
- Public accountability and information dissemination to public.
- Implementation funds to be placed in interest-bearing account for perpetuity.

Vic DeVlaming - SWRCB April 14

1. “I am stunned that the ecosystem restoration group failed to consider contaminants. What is the disjoint here? Why are the ‘ecologists’ uninformed and/or ignoring chemical contaminants? Where and how have we failed in the education process? We must be poor educators or we have a very recalcitrant audience.”
2. Recommends development of ag practices which reduce or eliminate the use of pesticides which have tended to move offsite. Not necessary to undertake additional studies of this. Ample evidence of the problem exists.

3. Water quality proposals should include toxicity and Toxicity Identification Evaluations and chemical analyses to determine exceedances.

G. Fred Lee - G. Fred Lee and Associates April 15

1. inappropriate to assume elevated concentrations of toxicants result in a problem. Should be considered a potential problem requiring investigation. CALFED should focus its efforts on defining real impairments.
2. Evaluation Monitoring approach: determine existence of toxicity over space and time in risk assessment context.
3. Jumping straight to control measures will result in massive waste of public funds.
4. Example: determine whether excessive mercury is showing up in edible fish tissues. If so, determine sources of specific forms of mercury responsible.
5. Excessive plant biomass inhibiting recreation is a real impairment, due to eutrophication.

Larry Brown, USGS April 15

1. Agrees with Luoma, Spies, DeVlaming. Greatest fear is CALFED will spend millions to no avail. Agrees with idea of independent authority.
2. The four (presumably CALFED resource areas) should be integrated. One criterion for screening proposals should be that it focuses on a geographic area the is considered important by the habitat group, for example. Lack of linkage among the groups is disturbing. (DeVlaming is said to have expressed a similar view.)

Sam Louma - April 17

Agrees with above Spies recommendations

Vic DeVlaming, SWRCB April 17

1. CALFED should be sent a strong message: The proposals the PWT approved should be funded by CALFED.

Scott Ogle, Eco Risk April 17

1. Remediation is being considered ahead of establishing the problem. Agrees with Sam Louma.
2. Agrees on need for high level framework recommended by Spies and Bruce Thompson.
3. PWT has identified studies that will provide the necessary information. These should be funded.

Leo Winternitz - April 18

1. Fred Lee's comments make sense, as do most of the others. However, serious concern with the general direction of thought concerning the need to understand causes of

- impairments before remedial action is taken. Questions what, then, have contaminants researchers been doing for the last 15 years? Something must have been learned by now.
2. Should PWT members need to develop a “know” vs. “don’t know” list for CALFED to base its actions on? Did Aquatic Habitat Institute already do this, and can’t this be updated as necessary, and used?

Bob Spies - April 21

In response to Leo:

1. Yes, much data have been collected over the years and much has been learned. There is a developing consensus on the need for flows. We do not, however, know whether fish populations are impaired by contaminants.
2. Agrees with Fred Lee there is a great potential for doing the wrong thing; existing laws and regs cannot be assumed to provide guidelines to fixing problems; there is a need for peer review.
3. The projects recommended by the PWT should be funded, but they need to be put into some context and be part of some process. Someone needs to put the pieces together.

Howard Bailey, EVS April 25

1. Agrees completely with Fred Lee and Victor DeVlaming. We need to take action on the basis of our best professional judgement with the intent of protecting systems prior to their reaching a level of perturbation from which they cannot regain their old structure.
2. Awaiting the “body count” before taking action is inappropriate.
3. We know there are lethal levels of pesticides seasonally present, and that “metals” like selenium [**selenium is not a metal**] are of concern.
4. Taking action can offend stakeholders, so the easiest way out is to just do more studies. This is a nice approach from the people perspective, but doesn’t do much for the ecosystem.

Bruce Thompson April 25

1. The “body count” analogy is out of hand. Fred Lee overstated the concept.
2. There is a lot of middle ground between CALFED’s proposal and studying the system to death.
3. The next step should be to work to a well thought out way to prioritize and proceed sensibly.

COMMENTS from the Water Quality Technical Group:

Sacramento Regional County Sanitation District

Priority subject areas:

1. Endorse comprehensive monitoring program concept.
2. Further reduction of pollutants in storm water runoff has already begun, and will require

education and technical solutions that will not be easy to achieve. Should dissolved oxygen read "oxygen demanding materials"?

3. Supports coordinated watershed water quality activities to reduce toxic contaminants.
4. Reduction of mercury should be high priority because of bioaccumulation concerns.

Selection criteria:

1. Supports adding water quality-specific selection criteria because physical habitat characteristics by themselves will not protect Delta biological resources if water quality is inadequate.
2. Fourth bullet under Water Quality Specific criteria eliminate the word "numeric"

S.D. Murrill & Co.

Priority subject areas:

1. Item 2 - Reduction of pesticides. Counterproductive to focus on specific chemicals. Say "Reduction of the impacts of pesticides in the Sacramento and San Joaquin Rivers from surface agricultural drainage and Delta island drainage."
2. Item 3 - As above, reword to "Reduction of the impacts of pesticides, nutrients, salinity, dissolved oxygen, turbidity and metals in urban storm water runoff".

Selection criteria:

1. Proposals cannot be for implementing projects for which other funding is available. Should consider projects on their merit. Then, if other funds are available, work with project sponsors to develop partnership or cost sharing relationship.

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