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Comments for CALFED

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>
>Chris <italic>et al.</italic>

> I completely concur with Luoma's and Spies' assessment of the CALFED
> request for input on the upcoming call for assistance on water quality.
> I hope CALFED will carefully consider their comments. They are two
> senior environmental scientists in the region well attuned to the ways
> that science and management need to interact. There needs to be some
> overall framework for integrating water quality monitoring, special
> studies, and remediation programs into the EERP. As pointed out by the
> National Academy of Sciences several years ago, such a "systems" are most
> effective when part of a well conceived, adaptive program.

> However, having seen a little of how CALFED operates, they will probably
> want to proceed according to their current plan, so I'd like to focus my
> comments on how CALFED might use this upcoming funding opportunity to
> move towards Luoma and Spies' suggestions. Why not use this funding
> opportunity to create the framework? Specifically, could the word
> "actions" in first question be interpreted in a very broad sense. Could
> an action be planning study to set the needed framework, or special
> studies on some obvious, critical aspect of the issue that would probably
> need to be done even when a framework was completed?

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> For the second question, impacts and assessments need to be made
> compared to something. Water quality objectives and criteria are the
> yardstick used by regulatory agencies. However, most people question the
> ecological validity of most water quality objectives. Good studies could
> establish meaningful environmental guidelines for contaminant
> concentrations. There are no regulatory sediment or tissue
> concentration criteria. However, several sediment quality guidelines,
> such as NOAA's Effects Range concentrations (ERL, ERM), apparent effects

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>thresholds (AET), or EPA's draft sediment quality criteria do exist that
>could be used for sediment comparisons. For tissues, the State Board
>uses Median Tissue Residue Levels (MTRLs), but US FDA guidelines, EPA
>screening values, Median International Standards, as well as literature
>values for tissue levels that cause effects exist that could be used.
>Again, good studies could determine region specific concentrations
>related to ecological effects.

> I presume that the Priority Water Quality Subject Areas are draft, or
>potential RPF topics. I further presume that the specific contaminants
>listed came from CALFED's water quality work group. It might help to
>know how they chose them. Does the PWT generally agree that those
>contaminants are the priorities?

POL
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> I would suggest that CALFED state what "reduction" means. Again, could
>it be interpreted broadly to infer that planning studies to assemble a
>framework outlining a plan of attack on each issue, or other special
>studies were welcome, or does it really have to be an engineering or
>technology type solutions? Studies of all three types could proceed,
><bold><underline>IF</underline></bold> they would obviously become part
>of an overall plan to determine which contaminants were in fact causing
>the biggest problems, where they came from, and what to do about them.

Ag.

> To that point, the PWT has spent a considerable amount of time
>developing studies in this context. Although our process has been
>somewhat independent of CALFED's, our goal is the same: Understanding what
>the problems are in order to affect "reduction". The PWT's studies are
>prerequisites to knowing what to reduce, where. I hope CALFED will
>include language in their RFP, or allow for a broad interpretation, that
>will facilitate funding for our proposals.

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