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Topic: RE CALFED Action RFP  
Sent: 04-23-97  
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To: Howe, Carol; Carol Howe

Mail\*Link

RE CALFED Action RFP

>Date: Tue, 22 Apr 1997 15:03:37 -0700 (PDT)  
>From: Chris Foe <chrisf@bptcpl.swrcb.ca.gov>  
>Subject: RE CALFED Action RFP  
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>  
>I promised Cindy Darling that I would try and summarize the PWT's  
>position on the proposed CALFED water quality actions. I don't want to  
>do this as I am not sure we have yet heard all the comments and I don't  
>detect any strong consensus emerging yet. Instead, I have forwarded all  
>comments to Cindy and Rick Woodard. However, I would like to try and  
>summarize my personal opinions. I have three general comments.  
>  
>First, pesticides in ag and urban runoff, metals in the upper Sac River,  
>and Selenium in the San Joaquin were nominated by the water quality group  
>for inclusion into the priority water quality action list because they  
>were known to exceed Regional Board Basin Plan numerical or narrative  
>water quality objectives. I agree with Dr Lee that this ONLY makes them  
>candidates for causing ecological impact. This is because objectives  
>have built in safety factors. Traditionally, however, exceedances of  
>water quality objectives have been sufficient to trigger remediation.  
>Many members of the PWT are suggesting that a higher standard of evidence  
>should be required for expenditure of CALFED money. The additional  
>evidence being that the chemicals are actually demonstrated to cause  
>population changes to species of concern. I think that it is a CALFED  
>management call to establish how much evidence is required  
>before remediation money is spent. Presumably, similar weight of  
>evidence approaches are being used now to establish whether money should  
>be spent on installing screens, dumping spawning gravel etc.  
>The same standards need to be applied to water quality. However, if  
>additional evidence is thought advisable then I would suggest that the  
>early implementation RFP should call for BOTH collecting the scientific  
>evidence that these chemicals cause ecological damage and the  
>identification of treatment options. The actual remediation or

>"reduction" step should be postponed for several years until this  
>baseline data has been collected. I think that with some small changes Sam

>Luoma's suggested language should do the trick.

>  
>My second set of comments concerns mercury. Mercury, to the best of my  
>knowledge, is not present in the Central Valley or Delta at concentrations  
>that causes aquatic ecological damage. Rather, the chemical  
>bioaccumulates in long lived fish species and becomes a human health fish  
>consumption problem. I strongly support the inclusion of mercury into the  
>water quality action list although not quite fitting the CALFED ecosystem  
>restoration guidelines as I believe the public does not just want more  
>fish; they want more fish so they can catch and eat them. Elevated mercury  
>levels were recently reconfirmed in several commonly caught fish in SF  
>Bay. Similar data is needed to affirm that a problem still exists in the  
>Delta. Beyond that we really have almost no information on where the  
>mercury is coming from, what the bioavailability of the various sources  
>are, and whether reduction of incoming loads would reduce fish tissue  
>levels since such a large mercury reservoir already exists in the  
>sediment. Finally, the literature suggests that marshes are an optimal way  
>to methylate mercury and drive it into the aquatic food web. We need to  
>be very careful that the shallow water/marsh habitats that CALFED is  
>proposing to create in the western Delta don't end up as little  
>kestersons. In conclusion, I think we need to develop some background  
>information including before we can consider remediating mercury.

Monday  
release

12th

>Finally, Cindy asked whether there were other subject areas which we  
>thought should be included in the RFP. I think selenium concentrations in  
>Protomocorbula, sturgeon, and diving ducks in Suisun Bay are high enough  
>to pose a potential ecosystem health problem and to deserve inclusion in  
>the RFP process. Conversely, Pat Coulson has been directed to develop a  
>monitoring plan for CALFED. The plan is due to be released in early June.  
>Maybe the RFP should wait until the release of the CALFED monitoring plan  
>before calling for additions to it. Having said that, I do think it  
>appropriate to request in the RFP for toxicity identification evaluations  
>(ties) to determine the chemical cause of documented instances of unknown  
>instream toxicity. Previously, the call for TIEs were part of the  
>monitoring plan action item. TIEs are important because their results may  
>become the CALFED action items of tomorrow and we need to get cracking on  
>them today.

Wed  
12/11/82

L TIEs  
included  
was  
too!

>Thanks for your time and I hope some of this makes sense. Chris  
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