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By: Howe, Carol
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Topic: Comments on CalFed policy o
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From: rwoodard@goldeneye.water.ca.go
To: Howe, Carol; Carol Howe

- WAS
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Comments on CalFed policy on San Joaquin River

>From: THOMAS MAURER@mail.fws.gov
>Date: Wed, 23 Apr 97 14:28:56 MST
>To: rwoodard@water.ca.gov
>Return-Receipt-To: THOMAS MAURER@mail.fws.gov
>Subject: Comments on CalFed policy on San Joaquin River WQ

>
> Rick,
>
> Here are our comments on the San Joaquin River policy. Hope they are
> useful. We'll follow with a hard copy.

> Tom

>MEMORANDUM

>April 23, 1997

>To: Rick Woodard, CalFed Water Quality Program Manager

>From: Tom Maurer, USFWS-Sacramento Field Office

>Subject: Preliminary comments on DRAFT CalFed Roles and Policy with
Respect to San
>Joaquin River Water Quality Problems

>General Comments:

> Is there to be a CalFed Roles and Policy with Respect to Sacramento
River Water Quality
> Problems? If not, why not, and what is the purpose of this effort?

> Discussion of the current Grasslands Bypass Project should be included
in the document
> along with recent Regional Board activities such as the 1996 Basin
Plan amendment
> regarding the Grasslands area.

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EIN

> CalFed should be cautious and not give unqualified support to the San
Joaquin Valley
> Drainage Implementation Program. CalFed needs to evaluate the
SJVDIP's past and
> current activities, successes, and failures before identifying those
areas which CalFed can
> have the greatest impact. SJVDIP includes areas not within the

solution area of CalFed
> (e.g. Tulare Basin). Specific activities, targets, and deadlines must
also be identified
> before support can be given.

>
>Sources of water quality problems:

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> Refineries in the Carquinez Straits/Grizzly Bay area discharge selenium that recirculates through the Suisun Marsh system.

>
> In the last paragraph, page one, you include "irrigation tail water from wetlands" as being a significant pollutant source. The Service disagrees with this characterization and we have strongly argued against this inappropriate labeling to the Regional Board during a recent Basin Plan amendment proposal. Attached is a copy of our comments to the Regional Board on this subject. We recommend the statement be removed.

>
> In the last paragraph, page one, it is not clear what you mean by "dilution of salt...[with] upstream reservoir releases". Is this the San Joaquin or Sacramento River (ie. Shasta releases) ? The term dilution should be used carefully. The fact that a tributary river or tail water dilutes contaminants is different than purchasing and storing water with the explicit intent of diluting a pollutant, which is inconsistent with federal and state laws.
> Also, using the word dilution to identify real-time management is not entirely accurate and can be misleading. This leads back to several of the water quality action items which specifically recommend purchasing water with the intent to dilute pollutants. Although these action items received low priorities from the water quality teams they remain on the list. The ecosystem water quality team was opposed to including the dilution action items but agreed to leave them on the list if they were only considered as possible emergency actions for spill response or uncontrollable discharges, but this distinction has not been noted. Proposing such action items on dilution is inappropriate and will certainly attract severe criticism.

>
> Last paragraph, page one, include land retirement in the list of solutions. We feel that land retirement can be a extremely effective program to reduce selenium discharges.

>San Joaquin Valley Drainage Implementation Program

>
> Page 2, 3rd paragraph - Add "and lack of leadership" after "Primarily
due to lack of
funding".

> Bullet # 4, page 3 - It should be noted that the Rainbow Report stated
that most, if not all,
> of the in-valley solutions would be required as a first phase of an
out-of-valley solution.
> Because of the lack of success by the SJVDIP, the most important thing

CalFed can do is

> concentrate on the in-valley solutions and make these a top priority
for implementation.
> CalFed should make the distinction between in-valley and out-of-valley

solutions and be

> clear as to what support it intends to provide for each.

>
> Bullet # 6, page 3 - All recommendations should be considered, not
just those with local
> support.

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> Bullet # 8, page 3 - These are not the only source control methods.
Specific support of
> one method will tend to place other methods to the rear and provide
less incentive to
implement them.

> Bullet #9, page 3 - The 1997 Activity Plan needs explaining and
careful review by CalFed
> before full endorsement is given.

>Priorities for Action

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> Bullet # 1, page 3 - The extent to which CalFed gets involved with
long-term salt
> management in the San Joaquin Valley, especially the Tulare Basin
needs discussion at the
> top policy level. Clarity of actions, targets, responsibilities, and
leadership has been one of
> the stumbling blocks in dealing with drainage issues. If CalFed
policies on these issues are
> not sufficiently clear, confusion and polarization may increase.

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>
E Ecological Services

> Sacramento Field Office
> 3310 El Camino Avenue, Suite 130
>FWS/EC97-015 Sacramento, California 95821

November 12, 1996