

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

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MEMORANDUM

May 30, 1997

To: Rick Woodard, CalFed Water Quality Program Manager

From: Tom Maurer, USFWS-Sacramento Field Office

*Tom*

Subject: Comments on DRAFT CalFed Roles and Policy with Respect to San Joaquin River Water Quality Problems, dated May 6, 1997

The current draft of the policy statement has improved greatly as it more clearly summarizes current programs thus putting the proposed CalFed policies in better light. I appreciate your serious consideration of my previous comments on the March 30 draft. Below are comments on the May 6 draft.

Top of page 2, end of paragraph - The broad term "land use changes", we are assuming, includes land retirement. As we have stated previously, land retirement can be a extremely effective program to reduce selenium discharges, as well as selective fallowing and nonirrigated agricultural practices.

Page 2, first full paragraph - While adding the discussion of the 1997 Activity Plan the discussion of the UC salinity program was jumbled leaving the rest of the paragraph confusing.

Page 2, bottom paragraph - The inclusion of this paragraph discussing the Grasslands Bypass Project improves the description of current activities in the Valley. Since adoption by the Board of Waste Discharge Requirements for the bypass is not a certainty (but certainly welcome), using the word proposed rather than adopt may be a better way to phrase the sentence at this time.

Page 1, paragraph 1 and Page 3, bullet #6 - The discussion of out-of-valley solutions, Tulare Basin, and removing salts from the valley appears to be stretching the arms of CalFed beyond it's intended purpose. First, there seems to be a conflict with the "removal of salt from the Valley" with CalFed's solution principle regarding redirection of significant negative impacts. Second, the discussion of the Tulare Basin implies promotion of a valley-wide drain which is a proposal lacking any detail much less an evaluation of any sort. Thus considering it an "ideal solution" seems inappropriate to me. Ideal solutions for the two areas may not be linked close enough to warrant CalFed's involvement with Tulare Basin issues. As I mentioned in my comments on the March 30 draft, the most important thing CalFed can do is concentrate on the in-valley solutions and make these a top priority for implementation. If CalFed is flexible and uses adaptive management then issues regarding Tulare Basin and out-of-valley solutions that may impact the Delta can be addressed when it is more appropriate.

This is certainly a discussion topic for the top level policy makers within and among each of the CalFed agencies. Let me know if you would like to discuss this further.

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*Solutions*