

Axns

MEMORANDUM

Date: June 5, 1997

To: Bob Pine, Jean Elder, USFWS; Carol Howe, Montgomery Watson, CalFed consultant

From: Tom Maurer, USFWS *Tom*

Subject: Comments -WQ Program in Phase II Alternative Descriptions dated May 6, 1997

Page 10, San Joaquin Basin - Although bromide is an issue in the Delta it is not a substance at issue with the Grasslands area discharges as suggested here. -Axn

Page 12, Efficiency - Dilution actions in WQ program conflict with the water use efficiency program objectives. -Axn

Appendix B - Water Quality Program

Page 1, Mine drainage, Cd, Cu, Zn - This action, although not specifically mentioned, seems to be directed at Iron Mountain Mine (IMM). CalFed agencies at the top level need to decide policy with respect to IMM. CalFed involvement should be carefully considered as current cleanup activities are progressing, improvements have been made and are continuing. -Axn

Page 2, mine drainage, mercury - methods should include identifying activities in watersheds that may promote the methylation of mercury (e.g. pit gravel mining, creating other anaerobic situations including reservoir construction). This may be implied but is not clearly stated as an important method separate from identifying sources. -Axn

Page 3, Urban and Industrial Runoff, chlorpyrifos and diazinon - Reference such as (see also agricultural drainage) should be added in action item to provide cross reference to related actions. This would be useful for all parameters that are covered under different sources (i.e. cadmium under mine drainage and urban/industrial). -Axn

Page 4, Wastewater and Industrial discharges - Would expansion of boat discharge actions to upstream reservoirs also improve river water quality thus ultimately Delta water quality? Axn

Page 5, Wastewater and Industrial discharges - Selenium dischargers should be included with copper and mercury at Suisun Bay and Carquinez Straits area. Performance measures - Reduction in selenium loadings from industrial dischargers. Indicator of Success - Removal of health advisories, decrease in bird, fish, and mussel selenium levels to levels protective of wildlife. Axn

Page 5, Agricultural Drainage - Should oxygen depletion due to nutrient loading also be included under this source? Also sediment loading due to farming and logging would seem appropriate here. -Axn

✓ Page 6, Agricultural Drainage, selenium - Other Indicators of Success can be decrease of selenium concentrations in biota, achieve Basin Plan and EPA objectives for selenium in the San Joaquin River. - Axn

✓ Page 6, Agricultural Drainage, salinity in South delta - Storing or using water with the explicit intent of diluting a pollutant is inconsistent with federal and state laws, and conflict with the water use efficiency program objectives of CalFed, and likely other CalFed underlying principles. - Axn  
 Water quality action items which specifically recommend purchasing water with the intent to dilute pollutants were discussed in several water quality team meetings. 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 and agreed to leave them on the list if they were only considered as possible emergency actions for spill response or uncontrollable discharges. This distinction has not been noted. Proposing such action items on dilution is inappropriate and will certainly attract severe criticism during the PEIS review.

✓ Construction of tide gates or dams in the Old River area also seems to conflict with the CalFed principle of not redirecting significant negative impacts. - Axn

✓ Page 9, Water Management - See comments on dilution above (Page 6, Agricultural Drainage, salinity in South delta). - Axn