EPA Comments on
7/1/97 Draft
"CALFED Bay-Delta Program Role and Policy
With Respect to San Joaquin River Water Quality Problems"

8/4/97

General Comments:

We continue to question why CALFED is developing this issue paper. When presented with the first draft in March, the Program Coordination Team was told that the purpose of the paper was to clarify CALFED's intent to focus on San Joaquin Valley problems, and not those of the Tulare Basin. Yet, the focus and tone of this paper goes well beyond this scoping question and raises a number of other issues. EPA has serious concerns about this issue paper: What is its' primary purpose? How this paper will be used and reflected in CALFED documents and programs? Who is the target audience?

From the title of the paper ("San Joaquin River Water Quality Problems") and the list of problem sources on the first page, one would infer that the paper will be a broad discussion on the broad range of pollution problems in the San Joaquin Basin. However, the rest of the paper focuses exclusively on agricultural drainage and salinity problems. We are very concerned about the emphasis on the desire to export salts out of the San Joaquin Valley. While we appreciate the removal of references to out-of-valley solutions from the bullets articulating CALFED policies, there is still an inappropriately heavy emphasis on exporting salts out of the valley in the introductory, background text.

Given our concerns articulated above, we believe that CALFED should not move ahead with this issue paper without clarifying its intent and usage, and modifying the tone and content accordingly.

Specific Comments:

Page 2, first (partial) paragraph, last sentence -The listing of potential measures in the last sentence of the first paragraph should be reordered, such that "drainage reduction and reuse" is first in the list (as it was in the previous draft of this paper). Because the order of measures may be interpreted by a reader as a prioritization amongst the measures, we believe that drainage reduction and reuse ought to precede "timed drainage release" and the other measures included in this list. (Our preferred order of sequencing for the full list is drainage reduction and reuse; land use changes which may include cropping changes, land fallowing and voluntary, compensated land retirement; drainage treatment to reduce trace elements and other contaminants; salt separation and utilization; and timed drainage release.)

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL # of pages ▶ 2

To Rick Worland	From [illegible]
Dept./Agency CALFED	Phone # [illegible]
Fax # [illegible]	Fax # [illegible]

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

Page 2, second paragraph (first full paragraph) - the acronyms depicting agency names used in the second sentence should be spelled out at the time of their first usage.

Page 2, third paragraph (second full paragraph) - the third sentence discussing the SJVDP 1990 Plan mischaracterizes that report's discussion on salt removal. This sentence should be replaced with the following: "The SJVDP 1990 Plan states that "(I)t appears that in-valley actions can manage the problems for several decades without a means of exporting drainage-related salts to the ocean. Ultimately, it may become necessary to remove salt from the valley." (Reference page 1 of the 1990 Plan) The report further states that "(I)f salt export becomes necessary in the future, the actions recommended in this plan could create prerequisite conditions by providing collection facilities, by reducing drainage water volumes, and by isolating and controlling contaminants." (Page 4 of 1990 Plan)

Page 2, last paragraph carrying over to page 3 - This paragraph discusses the Grasslands Bypass Project. The second sentence should be replaced with the following (we developed this language in conjunction with the Bureau of Reclamation):

> "The agreement requires participating irrigation and individual drainage districts to meet specified monthly and annual selenium load values. The Use Agreement allows for use of the Drain for an initial 2-year period; the agreement may be renewed for up to three additional years provided the Regional Board has adopted an approvable Basin Plan amendment and Waste Discharge Requirement for the Project, and that the draining parties have developed a long-term regional drainage management plan. The time frame for extending the agreement beyond the initial two years is dependent upon the amount of time necessary to complete the environmental documentation to implement the long-term plan."

In the next sentence (as well as in the fifth bullet on page 3), "Drainage Oversight Committee" should be changed to "Grasslands Bypass Channel Project Oversight Committee".

Page 3, first paragraph - The level of detail contained in this paragraph is inconsistent with the rest of the paper and seems unnecessary. In addition, the status of this particular court case is rapidly changing and this paper is already out-of-date. We believe that it is appropriate to eliminate the entire discussion regarding this court case.

Page 3, fourth bullet - The Grasslands Bypass Project Use Agreement should be included in this list.

Page 3, fifth bullet - The last sentence calling for the implementation of the "interim solutions endorsed by the SJVDIP" should be deleted. CALFED agencies have not been presented with information on these interim solutions and, therefore, a CALFED endorsement is not appropriate at this time.

Page 4, first paragraph of text - Replace "SJVDIP" with "existing entities"