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**Modesto  
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November 26, 1996

Mr. Rick Woodard  
Water Quality Program Manager  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

Dear Mr. Woodard,

The following comments are offered in response to my review of the materials distributed at the Water Quality Technical Work Group meeting held on Wednesday, November 20, 1996, in Sacramento. I would like to commend the CALFED staff for the work effort they have put forth. I recognize the awesome task that has been laid out before them. However, I would caution that before the process gets too far down the road, due consideration be given to the development of a broader based approach to developing potential solutions to the many problems of water quality in the Bay-Delta as opposed to the development of narrowly defined steps that may not be practical or achievable.

#### Prioritized Action List

The process needs to better integrate the parameters of concern from the three separate sub-groups in such a way that does not allow a bias of a particular sub-group to outweigh the others input. I would suggest that the CALFED staff use the information provided by the three sub-groups and develop a standardized review of each item instead of attempting to develop a "top ten" list. There is probably no equitable method of weighting the scores from each group, especially if individuals within each group ranked the list from a different direction, i.e., some with their group "hat" on and others "hatless." Also, the linkage between the individual sub-groups water quality problem statements and objective statements seems to have broken down when compared to what has been compiled into the proposed 32 action items.

Many of the action items need to be re-written in order to better define their intent. It appears that several of the items could be consolidated into a single action item of a common concern. For example, action items 1 through 16 are all related to the agricultural drainage problem on the west side of the San Joaquin Valley. The action plans need to be conceptual in their framework

and focus more upon "what to achieve" as opposed to "how to achieve" a desired goal as the plans are now formulated. I believe that too much emphasis is placed on agricultural drainage issues without identifying the broader concern which is to keep the dissolved salts out of the San Joaquin River in the first place. In general, it is runoff resulting from all types of land uses that contributes to the pollution of the Bay-Delta.

### Parameter Ranges

It is too early in the process and probably not the charge of CALFED to develop numeric standards. The outlined approach is too specific. At this point in the planning process it would be better to capture a broad range of parameters and not identify specific concentrations. The water quality parameters of concern should be refined into goal and objective statements, not "shall not exceed" language for specific parameters or ions. In addition, and perhaps more importantly, the water quality parameters will have to be measurable in order to weigh various alternatives against one another and must be practical and achievable in the field. Otherwise, the work is too detailed to be implemented and it will be very difficult to achieve concurrence with the group.

### Analytical Plan

I appreciate the opportunity to comment on the information provided at the meeting. However, due to the short turn around time, I have not had adequate time to properly review the Plan for Analysis with any detail. I would expect that we will see an overview of the process at the next meeting and be given a little more time to review the information before the next step in the process goes forward.

Sincerely,



Walter P. Ward, AGM  
Water Operations