

**COMMENTS ON DRAFT CALFED WATER QUALITY PROGRAM**

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1. Page 1: With regards to the modeling technical support team-It is important that any water quality models which are developed be thoroughly validated with real-life monitoring data.
2. Page 1: From my reading, it is not clear how all the programs and reports mentioned on this page relate to one another. Nor is it clear from where and how (i.e., various ways) projects/studies or action items will be submitted to the WQTWG. How were and who originated the "studies currently planned as part of the Common Water Quality Program?"

**Pesticide Reduction by Source Control**

1. Include the State Water Resources Control Board in points #5, 6, and 7.
2. This action **MUST** include development of new alternative agricultural practices. Alternative practices involving the non-use of pesticides should be included in this item. So, include development, evaluation of success (in terms of pest control and water quality protection), and outreach of alternative agricultural practices designed to reduce offsite movement of pesticides. Inclusion of outreach is essential!! Furthermore, outreach must incorporate notification of growers, irrigators, pesticide advisors, applicators, etc. that there **ARE** pesticide-caused water quality problems. Many of these entities are completely unaware that there is a pesticide-caused water quality problem.

**Source Control by Watershed Management**

1. Clearly, this action item should be coordinated and integrated with source control of pesticides and financial incentives for IPM for agriculture.
2. Outreach **MUST** be a component of this action item. See my comments on outreach under source control of pesticides, above. Alternative practices have little or no potential for success unless interested and affected parties comprehend that current practices are resulting in water quality problems. At this time, affected parties do not have this comprehension.

Toxicity Testing and Toxicity Identification Evaluations (TIEs)

1. It is toxicity testing which has and will determine compliance with Regional Water Quality Control Board toxicity water quality standards. It is TIEs which have been and will be so successful in identifying the chemical causes of toxicity in toxic water quality samples.

Toxicity tests are the only relatively rapid integrative measure of all directly acting toxic chemicals in a water sample. All other tests/measures are chemical specific (i.e., do not measure additivity). Toxicity tests are the only measure of aquatic organism response to water samples and the only means of measuring bioavailability of chemicals.

Funds for SWRCB and Regional Water Quality Control Boards to monitor ambient waters for toxicity and to perform TIEs continue to decline. It is imperative that this action item be a high priority so that improvements (or further degradation) in water quality due to actions taken can be assessed.

Financial Incentives for IPM

1. Incentives other than financial (e.g., good stewardship) should be included in this action item.

GENERAL: I want to emphasize the importance of keeping Action Items #31, 11, and 32 in the priority list. For the SWRCB, these are extremely critical actions which our budget cannot currently cover