

COMMENTS ON CALFED ACTIONS - Action

1. There needs to be a separate action that addresses mercury. - Action
2. There needs to be a separate action for pesticides and salt. - Action
3. The mine remediation action should focus on abatement at abandoned mine sites. Following is a suggested rewrite of the action.

Reduce tributary and Delta heavy metals loadings by implementing moderate remediation measures at abandoned mine sites (i.e., sites that do not have responsible parties) that contribute significant loads to the Delta or cause significant impacts to aquatic resources associated with the Delta ecosystem (i.e., salmon, steelhead, striped bass). Pollution-credit trading should be used to facilitate remediation.

4. Here is a suggested writeup for a pesticide action. The integrated pest management action should be included under this action.

Reduce surface water concentrations of pesticides that are present at levels that have reasonable potential to cause or contribute to adverse impacts to aquatic communities.

Study steps:

1. *Summarize existing data to establish water quality conditions in the Delta and principle tributaries.*
2. *Determine which pesticides are present at levels that need to be reduced.*
3. *Establish a program to develop and evaluate practices that can be implemented to reduce pesticide levels.*
4. *Establish a program to assure that appropriate practices are, in fact, implemented.*
5. *Establish a monitoring program to 1) evaluate the success of implemented management practices in reducing levels of pesticides of concern, and 2) determine whether other pesticides are present at levels that warrant attention.*