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**To:** Rick Woodard - CALFED  
**From:** Carol Howe  
**Subject:** Review of Policy Paper "CALFED  
Role and Policy with Respect to San  
Joaquin River Water Quality  
Problems"

**Fax No:** 916/653-9745  
**Reference:**  
**No. of Pages:** 5  
**(including cover)**

Rick,

Per your request attached are John Dickey, Gwen Buchholz and my comments on the above referenced policy paper. Additional comments, referenced in the document, are stated below.

**Comment 1.**

With respect to water quality, CALFED's geographic scope (as defined in the WQ Component Refinement Report) includes:

- areas within the Delta
- areas outside of the Delta in which biological resources that use the Delta are impacted
- areas outside of the Delta that are significant source areas for parameters of concern in the Delta

**Insert 1**

Surface and subsurface seepage potentially containing nutrients, pathogens, and turbidity

**Comment 2 - Per John Dickey**

I have not picked up on a consensus among technical experts favoring salt removal from the system. Known methods are generally thought to be prohibitively expensive. Even reductions in salt loadings are not considered to be as practicable as reductions in trace element loading, but there is definitely more optimism about this than there is for removal. Of course, many recognize that keeping the salts in the Valley with source control is generally a finite solution to the problem, and that a drainage outlet will be a long-term requirement.

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**Comment 2 - Per Gwen Buchholz**

The term "salt removal" may need to be further defined in the Policy Paper (especially since this is a volatile issue). The definition should include 1) source reduction; 2) local treatment and disposal (evaporation ponds); 3) regional treatment and disposal; 4) collection and disposal (drain to ocean). Source reduction can include changes in irrigation practices, fertilization practices, and land fallowing or retirement.

**Comment 3 - Per Gwen Buchholz**

Do not know if you can mix purposes. But, from a water supply issue, this salt loading causes the release of up to 50,000 to 150,000 af/year from San Joaquin River tributaries (currently only the Stanislaus River) to maintain water quality for South and Central Delta diverters. This release usually cannot be exported or diverted because it is in addition to irrigation demands. It is also released at a time when it does not benefit anadromous fish and may be an adverse impact to striped bass and resident fish. If this release was not made we would have adequate water for Stockton East/Central San Joaquin and/or for April/May pulse flows which would significantly reduce the need for water purchased under CVPIA for anadromous fish.



Carol Howe

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