



**CONTRA COSTA
WATER DISTRICT**

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January 10, 1997

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

Subject: Comments on CALFED water quality projects for early implementation

Dear Mr. Woodard:

The Contra Costa Water District appreciates this opportunity to comment on the selection of specific projects for early implementation by CALFED to improve Delta water quality.

The District believes that source control is one of the most effective means of improving water quality in the Delta. The District urges CALFED to give high priority to programs that would reduce pollutant loads from agricultural drainage and wastewater discharges. This includes implementation of best management practices on pesticides applications such as the Integrated Pest Management (Action 11, 32B) to reduce the use of pesticide within the Sacramento-San Joaquin River watershed. Other drainage programs such as reconstructing subsurface drainage systems (Action 11) and improved land use management should also be accorded high priority. These projects need to be coordinated with efforts by EPA to set up source water protection assessment guidelines as part of the Safe Drinking Water Act Amendment of 1996.

Project Selection

The District also supports the pilot projects proposed by DWR's MWQI Program to explore different approaches to treat agricultural drainage on-site and to use real-time monitoring of Delta water quality to coordinate agricultural drainage discharges. Toxicity monitoring, including bioassays, should also be included in this monitoring program.

Project Show

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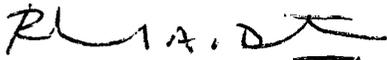
The emphasis should be on funding projects that take positive steps towards actually reducing contaminant loadings and improving water quality. Basic research studies (except for pilot studies) should be given lower priority. *Project*

Under Section D, Watershed Coordination, in your December 18, 1996 memorandum, item #4 should read "Implement recommendations" rather than "Utilize recommendations". CALFED should encourage active implementation of source reduction actions. *James*

The District would also like to note that some proposed projects need to be reviewed to see if they create other environmental problems. For example, No. 5 in the category of "Surface Drainage Source Control" of "High Priority Projects" in your December 18, 1996, memorandum proposes to store agricultural drainage in open surface reservoirs. This could create an attractive nuisance and expose wildlife, particularly waterfowl, to high concentration of selenium. *James*

Please contact me at (510) 688-8187 if you have any questions.

Sincerely,



Richard A. Denton, Ph.D., P.E.
Water Resources Manager

RAD/KTS