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Descr: City of Sacramento comments on Draft CMARP Drinking Water Program.

Department of Utilities
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September 16, 1998
980546:EC

Rich Breuer, Chief
Municipal Water Quality Investigations Unit
California Department of Water Resources
1020 Ninth Street, Third Floor
Sacramento, CA 95814

SUBJECT : CMARP DRAFT DRINKING WATER QUALITY REPORT

Dear Mr. Breuer:

Thank you for providing a copy of the 4 September 1998 draft Drinking Water Quality Report.

You have requested that we provide you with information on the Sacramento and American Rivers (Section 4.2.1). We have attempted to provide as much information as we could gather in the areas you requested. However, since we have concerns in other areas, we have also included additional comments for your consideration.

The City of Sacramento is committed to providing a safe and reliable drinking water supply to our residents. We appreciate the opportunity for input to the CALFED CMARP Drinking Water Quality Work team regarding topics for source water protection in the American and Sacramento River watersheds. We believe that such efforts would provide benefits downstream as well. The City of Sacramento has identified watershed management as a priority. We participate in regional watershed protection programs such as the Sacramento River Watershed Program (SRWP) and encourage the watershed/stakeholder approach in developing regional solutions with input of the various stakeholders in the watershed.

Much of your report has been taken from the 24 July 1998 draft report from the CALFED Drinking Water Issues Group. We have attached a 13 August 1998 letter to Bruce A. Macler from Jim Sequeira, City of Sacramento Director of Utilities. Mr. Sequeira's comments are applicable, in part, to your draft report.

Section 3.3 of the draft report describes the CMARP approach to identifying and implementing solutions to drinking water problems in the Delta and its tributaries. You propose:

- Identifying water quality conditions,
- Identifying water quality problems,
- Assessing water quality problems,
- Identifying best alternatives, and
- Implementing solutions.

We strongly endorse this approach.

We submit, however, that your report strays from this approach in many areas. The report singles out point source discharges and the NPDES permit process for correction before the necessary data has been gathered to determine if these point sources are a problem.

The Water Quality Control Plans for the Sacramento, San Joaquin Rivers and Delta have long implicated non-point sources as the principal impact to the beneficial uses of these waters. Admittedly the data behind these Water Quality Control Plans is not as comprehensive as the data currently being gathered by the SRWP or by the future efforts of CMARP. Of course we also recognize that point source discharges introduce substantial pollutant load to the Sacramento -San Joaquin rivers and Delta.

Considering the vast complexity of these water bodies and the many and varied pollutant sources, the SRWP has embarked on a comprehensive, stakeholder driven, program to identify water quality problems, determine the source or sources of these problems and to then work diligently toward solution of those problems. We suggest that CALFED CMARP embrace this approach as the expedient and cost effective way to reduce or eliminate these water quality problems.

As examples of where we feel your report is not following your own stated approach of identifying the problem before focusing on solutions, we submit the following:

- The report proposes the relocation of a discharge (Discovery Bay) before the problem has been quantified.
- It states that the existing State-Federal NPDES wastewater discharge permitting process is flawed, despite the fact you have not documented a problem.
- It proposes to look at discharges between Sacramento River mile 46 to 40 to evaluate the water quality impact at Hood before the problem is identified, and it ignores the impact from the rest of this vast watershed.

The State Water Resources Control Board and its nine Regional Water Quality Control Boards have closely regulated and monitored point source dischargers, including stormwater discharges from large urban areas. Extensive effluent and receiving water monitoring programs are required from those responsible for the discharges. Problems are corrected expeditiously. Non-point source problems have not received the same level of resources or concern. We respectfully suggest that CALFED CMARP, in cooperation with SRWP, provide the funds to increase existing monitoring of water quality conditions in the Sacramento-San Joaquin watershed, determine the source of any problems and recommend cost effective solutions.

Attached is a list of detailed comments. Thank you for the opportunity to provide input to this document. Unfortunately, due to the time constraints, it was not possible to put together cost estimates for the recommended monitoring studies, assessments, and research topics. If you have any questions regarding this letter or its attachments, please do not hesitate to contact me at (916)264-1424.

Very Truly Yours,

Elissa Callman
Associate Civil Engineer

cc Jim Sequeira, City of Sacramento
Gary Reents, City of Sacramento
Gary Carlton, Central Valley Regional Water Quality Control Board
Bob Shanks, Sacramento Regional County Sanitation District
Rick Woodard, CALFED
Byron Buck, CUWA

D-044993

Specific Comments on 9/4/98 Draft CMARP Drinking Water Quality Team Report

I. Section 4.2 CALFED Water Quality Core Program, 4.2.1 Sacramento and American Rivers

A. 4.2.1.1 Control Algal Blooms in Upstream Reservoirs and Aquatic Weed Growth in the Lower American River

Monitoring Needs
Existing:
Future: Special study at various locations along the Lower American River. Sites to include Nimbus, the intake to the Fairbairn Water Treatment Plant, and the confluence of the Sacramento and American Rivers. Monitoring parameters to include geosmin, 2-Methylisoborneol (MIB), temperature and pH. Sample collection during spring and fall, considering various flow conditions. Possible collection of baseline samples in winter and summer.

Assessment Needs
Existing:
Future: Evaluate special study data for correlation to temperature, river flows, and reservoir operations.

Research Needs
Existing:
Future: Identify controlling factors for algal blooms and possible control measures.

B. **4.2.1.2 Reduce Impacts of Agricultural Activities on the Sacramento River ~~due to Spring Runoff~~**

- Please modify the title of this topic to eliminate the words "due to Spring Runoff"

Monitoring Needs
Existing: Include information on Regional Board, Department of Pesticide Regulation, and USGS studies.
Future: Request input from the above agencies, UC Extension specialists, Farm Advisors, County Agricultural Commissioners, and agricultural interest groups.

Assessment Needs
Existing: Include information on Regional Board, Department of Pesticide Regulation, and USGS studies.
Future: Request input from the above agencies, UC Extension specialists, Farm Advisors, County Agricultural Commissioners, and agricultural interest groups.

Research Needs
Existing: Request input from the above agencies, UC Extension specialists, Farm Advisors, County Agricultural Commissioners, and agricultural interest groups.
Future: Request input from the Department of Food and Agriculture, Department of Pesticide Regulation, Regional Board, UC Extension specialists, Farm Advisors, County Agricultural Commissioners and agricultural interest groups on research or programs needs that could result in water quality improvements. Research ideas include how to prevent drains from discharging during spring storms and design of holding basins.

C. **4.2.1.3 Reduce Impacts from Cattle Grazing along the Sacramento River by Use of Best Management Practices**

Monitoring Needs
Existing: UC Davis extension studies on control measures, in cooperation with the grazing industry. The Cattlemen's Association has been supporting research on best management practices for grazing lands as well as promoting these practices in its educational outreach programs.
Future: Request input from Farm Advisors, the grazing industry, and UC Extension. Consider additional control measure studies and in-stream monitoring programs.

Assessment Needs
Existing: Request input from Farm Advisors, the grazing industry, and UC Extension.
Future: Request input from Farm Advisors, the grazing industry, and UC Extension. Support activities to better identify problems and solutions such as literature reviews and research.

Research Needs
Existing: Request input from Farm Advisors, the grazing industry, and UC Extension.
Future: Request input from Farm Advisors, the grazing industry, and UC Extension.

D. **4.2.1.4 Research on Impacts from Wild Animals**

Monitoring Needs

Existing: UC Davis Extension is planning studies on this topic.
Future: Support monitoring efforts, once identified.

Assessment Needs
Existing:
Future: Request input from UC Extension research and educational offices, Park Departments, and other interested parties. Support activities to better identify problems and solutions such as literature reviews, research, and in-stream monitoring programs.

Research Needs
Existing:
Future: Request input from UC Extension research and educational offices, Park Departments, and other interested parties. Support activities to better identify problems and solutions such as literature reviews, research, and in-stream monitoring programs.

E. **4.2.1.5 Determine and Control Impacts from Natomas East Main Drainage Canal, and 4.2.1.6 Determine Sources of Contaminants of Concern to the Sacramento River Watershed**

We request the opportunity to review these sections, once they have been more fully developed.

F. Add a sub-section regarding Evaluate and Reduce Potential Pathogen and MTBE Impacts from Recreation and Boating Activities.

Monitoring Needs
Existing:
Future: Conduct monitoring upstream and downstream of various activities during times of extensive recreational use.

Assessment Needs
Existing:
Future: Evaluate potential risk from these activities.

Research Needs
Existing:
Future: Support research to identify issues and solutions. Include California Department of Boating and Waterways, S.F. Bay Estuary Project, boating and marina interests, other recreational interests, Park Departments, enforcement agencies such as the U.S. Coast Guard, Regional Water Quality Control Board, County Sheriff Department, etc. in discussions.

II. **4.2.11.2 Control/Reduce Loading from Wastewater and Urban Discharges**

A. It is stated that "Existing discharges of treated effluent and urban stormwater runoff contribute to the total load of organic carbon, pathogens, TDS, and turbidity, and may affect drinking water quality in the SWP and near local intakes in the Delta.

We are not aware of the availability of pathogen data for stormwater.

B. **Subsection b. Identify Problems and Solutions to Urban Runoff**

Monitoring Needs

Existing: Add Sacramento Stormwater Monitoring Program

Future: Add support special studies on urban runoff issues.

Assessment Needs

Existing:

- Add American River Watershed Sanitary Survey Update report (currently underway).
- Add Stormwater Management Programs and studies.

Future:

- We recommend modification of the topic "analyze cumulative impacts on drinking water constituents of concern from all discharges between Sacramento River mile 46 and 40 on water quality at Hood". In order to obtain a complete evaluation of impacts, it is necessary to look at the entire watershed.

- Correction to "Build on existing programs (e.g., City Sac CMP) and evaluate BMPs with shown promise". Replace "City Sac CMP" with

"City/County Sacramento CMP".

- Replace "Develop and implement proactive pollution reduction programs using a regulatory standards approach" with "develop and implement proactive pollutant reduction programs implementing Best Management Practices to the maximum extent practicable". The current language does not reflect this state-wide approach to stormwater management.

Research Needs

Existing:

- Add Caltrans study, conducted by UC Davis, evaluating pathogen test methods for dry weather runoff.

- UC Davis Extension studies on domestic animals

Future:

- Support additional research efforts on urban runoff source identification and potential control measures, including consideration of cost effectiveness.

- Support additional research efforts on domestic animals, including surveys of veterinarians on incidences of giardia and cryptosporidium in domestic animals.