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December 30, 1997

Mr. Wayne S. White
Field Supervisor
U. S. Fish and Wildlife Service
3310 El Camino Avenue, Suite 130
Sacramento, California 95821-6340

Dear Mr. White:

This is in response to your letter of October 27, 1997. I apologize for the delay in responding. CALFED appreciates your comments to help develop an effective Water Quality Program to restore the ecosystem. In responding to your comments, I have attempted to keep the same order of issues presented in your letter.

Ecological Impacts of Salinity Patterns

The CALFED Bay-Delta Program addresses the ecological impacts of salinity and the location of X2 in the Bay-Delta ecosystem in a variety of CALFED Programmatic EIR/EIS documents. Following is a list of the most recent versions of CALFED documents as of December 10, 1997 that contain descriptions of salinity and X2 as it relates to the Bay-Delta ecosystem:

- Water Quality Impacts Technical Report (11/7/97)
- Environmental Impacts Technical Report--Fisheries and Aquatic Resources (11/21/97)
- Delta Simulation Model Studies of Alternatives 1A, 1C, 2B, 2D, 2E, 3E (8/4/97)
- Delta Simulation Model Studies of Alternatives 1A, 1C, 2B, 3E Analysis (12/1/97)

Together these four documents evaluate the impacts of the CALFED alternatives as well as the ecosystem and water quality actions on salinity and X2 based upon model simulations. All of these documents are available from CALFED. To avoid duplication and confusion with other CALFED elements, the Water Quality Program did not analyze the ecological impacts of salinity and X2 for its August 6, 1997 Water Quality Component Report.

Addition of Nutrients (Nitrogen and Phosphorous) to Parameters of Concern

Nutrients as nitrates were listed as parameters of concern to urban and agricultural beneficial uses in the August 6, 1997 Water Quality Component Report. Nutrients such as nitrate were not listed as a parameter of concern to environmental beneficial uses because the ecosystem sub-team responsible for identifying Parameters of Concern to the environment did not identify it as a parameter of concern. All parameters of concern are evaluated by the Water Quality Parameter Assessment Team and the Water Quality Technical Group before they can be considered for addition to the Parameter of Concern List.

CALFED Agencies

California The Resources Agency
Department of Fish and Game
Department of Water Resources
California Environmental Protection Agency
State Water Resources Control Board

Federal Environmental Protection Agency
Department of the Interior
Fish and Wildlife Service
Bureau of Reclamation
U.S. Army Corps of Engineers

Department of Agriculture
Natural Resources Conservation Service
Department of Commerce
National Marine Fisheries Service

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As a result of comments received from the USFWS on September 5, 1997 and October 27, 1997, a USFWS representative was asked to present scientific evidence to the Parameter Assessment Team supporting the need to add nutrients as nitrate and phosphorous to the Water Quality Parameter of Concern list. On December 3, 1997 Doug Morrison of the USFWS requested that the Parameter Assessment Team add nutrients as nitrate and phosphorous to the Parameter of Concern List. Based on the presentation by Mr. Morrison, the PAT recommended to the Water Quality Technical Group that nutrients as nitrate, bioavailable phosphorous, and nitrogen be added to the Parameter of Concern list.

Coordination of the CALFED Water Quality Program with Other Water Quality Monitoring Programs

Coordination of the CALFED Water Quality Program with other water quality programs in the area is important to ensure the best use of limited resources. Section 3 of the August 6, 1997 Water Quality Component Report contains a brief description of eleven federal, state, and regional monitoring programs for water quality, tissue, and sediment quality. This section has been updated in response to additional information received since August 6, 1997 and is reflected in the latest version of the Water Quality Affected Environment Technical Report which contains a description of eighteen federal, state, and regional monitoring programs for water quality, tissue, and sediment quality. CALFED welcomes further additions to the monitoring programs identified in that report.

CALFED is currently developing a Comprehensive Monitoring, Assessment, and Research Program (CMARP) to coordinate monitoring among various CALFED activities. This program will coordinate water quality monitoring and other monitoring efforts to ensure a comprehensive monitoring approach. Although the approach to CMARP is currently under development, there are several possible ways that monitoring programs may be integrated. For example, the data collected by various programs could be stored in a central accessible database, allowing individuals to share and access data from a central location, such as a Web page. Other ways that monitoring programs may be integrated include increasing communication among programs by continuing to provide an effective outreach program and by developing a mechanism for exchange of information such as through an electronic "clearinghouse". This clearinghouse would contain information on monitoring protocols as well as funding sources.

Coordination with the Ecosystem Restoration Program Plan

The Water Quality Program is closely tied to the Ecosystem Restoration Program, due to the potential impact of water quality on aquatic organisms. The Water Quality Impacts Report identifies the impacts to water quality associated with ecosystem restoration actions, water quality actions, and CALFED alternatives. Similarly, the Environmental Impacts Technical Report-- Fisheries and Aquatic Resources identifies the impacts to fisheries and aquatic resources associated with ecosystem restoration actions, water quality actions, and CALFED alternatives. Both of these documents are available from CALFED.

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Section 3 Comments

Light Attenuation/Penetration/Clarity: Turbidity is currently listed as a parameter of concern. Light attenuation/penetration/clarity are different ways to measure turbidity and they are included in the program as tools to measure turbidity but not as parameters of concern. At the December 3, 1997 meeting of the Parameter Assessment Team, light attenuation/penetration/clarity as Parameters of Concern were not discussed because we ran out of time. Our next Parameter Assessment Team meeting is January 28, 1997 and we intend to cover this topic at that time. We would be interested in having you or your staff present additional information regarding your recommendation at the January 29, 1998 PAT meeting.

Selenium: The tissue values used for selenium were recommended by the Water Quality Parameter Assessment Team and are intended to reflect the San Luis Drain Reuse Values. Based upon a review of the San Luis Drain Reuse Technical Advisory Committee Guidelines, May 1993 the guidelines appear consistent with the values in the August 6, 1997 Water Quality Component Report.

Section 4 Comments

Sources Discussion: The discussion of sources of Parameters of Concern has been expanded upon since the first draft of the August 6, 1997 Water Quality Component Report. Sources of Parameters of Concern are discussed in Sections 3.2 and 3.3 of the Water Quality Affected Environment Technical Report. This level of detail is consistent with the programmatic level of the CALFED Bay-Delta Program. However, should the USFWS provide CALFED with more detailed information on the sources of Parameters of Concern, CALFED staff will evaluate that information for possible incorporation into the appropriate documents.

Loadings Tables: The Loadings section identifies loads for water quality Parameters of Concern. Given that total nitrogen and total phosphorous were not listed as Parameters of Concern by the CALFED Water Quality Program for the August 6, 1997 Water Quality Component Report, they do not appear in the Loadings section. On December 3, 1997 the PAT recommended that the Water Quality Technical Group add bioavailable phosphorous and nitrogen to the Parameter of Concern list, per the request of Doug Morrison of the USFWS. During the comment period of the Programmatic EIR/EIS, loading estimate for these parameters will be developed and included within the appropriate documents.

Section 5 Comments

Copper Exceedences: Inaccurate statements will be corrected.

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Impaired Waterbodies: All impaired waterbodies associated with a Parameter of Concern and occurring within the CALFED geographic focus are included in the program. Agricultural sources are one source of parameters identified by the Clean Water Act Section 303(d) list.

Boundaries of the Bay: In accordance with CALFED policy, the Bay Region includes Suisun Bay and Marsh, San Pablo Bay, and the Bay watershed. In addition, a zone of approximately 25 miles offshore from Point Conception to the Oregon border has been included to cover potential ocean harvest management of anadromous fish along the California coast. Certainly anadromous fish roam beyond this artificial boundary, but the purpose of this boundary is to identify the area where most anadromous fish from the Bay-Delta system occur and cover where harvest management actions would be employed. A description of the CALFED geographic focus area is including in the Water Quality Program Plan which is included in the appendix of the Programmatic EIR/EIS.

Section 6

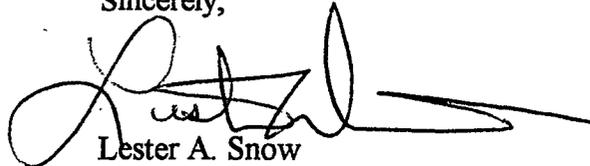
Wastewater Treatment Plant Discharges: The discussion will be expanded as appropriate. Any additional information that the USFWS could provide on this topic would be appreciated.

Section 7

Water Quality Actions are currently being evaluated and comments will be incorporated, where appropriate. Please note that the USFWS comments on water quality actions will be evaluated in concert with the more than 200 comments CALFED has received to date on the water quality actions. By January 5, 1998 CALFED staff will have comprehensively analyzed all the action comments received to date and incorporated them, as appropriate.

If you have any further comments or questions, please contact me at (916) 653-2994.

Sincerely,



Lester A. Snow
Executive Director
CALFED Bay-Delta Program