



**CALFED
BAY-DELTA
PROGRAM**

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September 8, 1997

Tom Zuckerman
Central Delta Water Agency
P.O. Box 1461
Stockton, CA 95201

Dear Tom:

Thank you for your August 13, 1997 comments on the August 1997 Draft Component Report.

I agree that we need to be careful how organic carbon inputs to the Delta are portrayed. I also agree with your contention that evidence is lacking to prove organic carbon contributions from Delta islands under agricultural production are greater than might be the case under "natural" conditions. Therefore, there is inadequate scientific support for blaming Delta agricultural interests for causing pollution that exceeds historical conditions.

On the other hand, discharges from islands do affect Delta water quality adversely with respect to drinking water supply. From this perspective, organic carbon is a pollutant. In my view, water quality degradation from whatever source is undesirable; and, I think this would be true of discharges from Delta islands whether resulting from agricultural practices or natural conditions. Therefore, I believe it should be CALFED's interest to support measures to reduce problems from this source where feasible, without an intention to single out individuals as causes of the problem.

As was announced at the August meeting of the Water Quality Technical Group (WQTG), we do not intend to finalize the Draft Component Report, as this is only a working document provided for the use of the WQTG. We intend to incorporate your comments into the Water Quality Technical Appendix to the CALFED Programmatic EIR/EIS where this material will formally appear. Specifically, the changes you recommend to page E-4, last paragraph and page 3-5 first paragraph, seventh sentence, will be adopted. Your comments on Section 2, page 2-2 and page 3-5, last paragraph make reference to average DOC levels found in drinking water supplies in the U.S. We are aware of one or more nationwide surveys. However, it is not clear whether this reference is to one of these surveys or from another source. We would appreciate your providing us with specific support for the statements you recommend including in these report sections.

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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Past experience has taught me that statements concerning Delta water quality are subject to misinterpretation by others. Accordingly, we realize the importance of being careful to use language that offers minimal opportunity for incorrect interpretation. Thank you for helping us to arrive at a fair representation of this issue.

Sincerely,

Justin Hall (for Rick Woodard)

Rick Woodard, Program Manager
Water Quality