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November 4, 2002

Mr. John Andrew
Program Manager, Drinking Water Quality
CALFED Bay Delta Program
1416 Ninth Street, Suite 1155
Sacramento, 95814

Dear Mr. Andrew:

SUBJECT: Comments on CALFED Drinking Water Quality Strategy 2002 (Redraft October 16, 2002 version)

The Sacramento Regional County Sanitation District (District) has previously submitted comments on the proposed CALFED Drinking Water Quality Strategy (Strategy) in a letter dated October 7, 2002. Subsequently, a redraft of the Strategy dated October 16, 2002, was provided to the Drinking Water Subcommittee for comment, attached are the District comments.

We appreciate the continued opportunity to work with the CALFED Drinking Water Subcommittee in developing the strategy and work plans for this important endeavor. Please contact me (876-6001), Mary James (876-6038), or Ruben Robles (876-6119) if you have questions regarding the points we have made in this letter.

Sincerely,

Robert F. Shanks
District Engineer

Attachment

cc: W. Kido
M. James
R. Robles
T. Grovhoug
S. Harader

**SRCS D Comments on BDPAC-DWS Recommendations
for a CALFED Drinking Water Quality Strategy 2002 –
REDRAFT (October 16, 2002 version)**

Page 4 – Re Salinity Management, last sentence – A phrase should be added to indicate that our ability to reduce salinity in the Delta will be limited by (a) the cost-effectiveness of available control measures within the watershed and (b) the influence of salt water intrusion.

Page 5 – First bullet – The wording is confusing. Does it mean to say that the numeric targets stated in the ROD for bromide and TOC are considered to be surrogate indicators of the overall quality of water in the Delta that is desired for drinking water supply? It should be clarified that the numeric targets were not the product of a holistic risk assessment or watershed management plan which considered the ability to achieve the targets.

Page 5 – Third bullet – As stated in previous comments, the development of a baseline assessment of health risk should be one element in an overall strategy to perform a holistic risk assessment which includes risk reduction achieved through source controls in the watershed as well as risk reduction achieved through treatment of raw water supplies.

Page 5 – Sixth bullet – This wording attempts to address the previous SRCS D comment that the implementation of the strategy should be funded, in large part, by the beneficiaries. It is recommended that the wording be changed to directly state this point. The present wording which encourages the creation of “funding mechanisms that recognize all of the beneficiaries” does not say the same thing.

Page 7 – Delta Source Improvement – It is recommended that the strategy acknowledge, at some point, that changes in Delta water quality through point or non-point source controls are difficult to achieve, given the magnitude of flows and flow volumes in the Delta and the relative contributions from individual or categories of most sources.

Page 9 – First paragraph, last sentence - Request that the words “potential impacts from” be inserted after the words “leading to.”

Page 9 – Second paragraph, second sentence – Request that references or citations be provided for the statement that “The Delta is highly eutrophic (typo), which promotes algal growth.”

Page 15 – Treatment Options – Last sentence. Request that acknowledgement be made that salt removal as part of a water treatment process is more effective and less costly than salt removal as a watershed source control measure.

Page 17 – Public Policy and Investment Strategy – Note that text is missing in the October 16 2002 draft.