2-11-03
MEMO:
From: Leah Wills
To: The DWS Co-Chairs
John Andrew, CALFED Water Quality Program Manager
Elaine Archibald, CUWA
Lisa Holms
Lynda Smith, MWD
Robert Gilbert, DHS

As requested by Ms. Archibald and Ms. Holms I will reiterate my oral comments made at the DWS 1-31-03 meeting on two documents, the "DWQP Strategic Plan Structure and the "Workplan (for the) Development of Drinking Water Policy Central Valley Region Basin Plan". Then I will elaborate on a few points not included in my oral comments at the DWS 1-31-03 Meeting. Because I hadn't had time to fully absorb the documents during the time allotted for review and comment, these are new and additional comments and will be identified as such.

Reiteration of previous comments on the "Workplan (for the) Development of Drinking Water Policy Central Valley Region Basin Plan".

- Title: The title of Agenda Item 4 should be revised to "Technical Analysis to Support Development of Drinking Water Policy (for the)Central Valley Regional Basin Plan".
- Page 2 , Task 1, Scope: The Work Plan will be implemented by Drinking Water Policy (add the word "Technical" here) Work Group.
- Page 2 , Task 1, Scope: There was/is considerable confusion in my mind about whether the DWS is the policy group advising the technical work group or whether the technical work group was seeking to duplicate the DWS by developing a broad stakeholder policy and technical group to do both technical work and policy development. I think this was resolved by the DWS agreeing to become the policy body for this work plan and that the DWS would make another effort at soliciting the involvement of agricultural interests from the Central Valley since this work plan may directly affect them. I thought that the Technical Workgroup would remain small and would focus on technical (e.g. monitoring, modeling, constituent prioritization) issues in order to be to be more directed and effective. Please clarify the 3 paragraphs on page 2 under "Scope" to reflect this understanding or whatever was ultimately decided about membership and scope of work issues at the 1-31-03 DWS meeting.
- Page 3, Task 2, Identify Existing Data:

First point-please consider renaming this task to "Identify Existing Data, Identify Significant Data Gaps and Identify (funding, institutional, methodological) Constraints for maintaining , expanding or redirecting existing CVRWQCB data collection efforts". Please review the attached letters from the AB 982 PAG and the Executive Director for

the SWRCB to better incorporate the reality of agency budget cuts into the scope of work for this project.

Second point-although the focus will be below the dams, the technical workgroup should at least, include watershed models and modelers who are working with watershed groups above the dams. This would be necessary in order to include upper watershed water quality baseline data and transport dynamics and, therefore, to better understand downstream receiving water quality effects. Watersheds above the dams have been characterized as having relatively high quality water. I do not believe that continued high quality water should be assumed into the future, given some of the land management changes that are being initiated in the Sierran watersheds at this time. Better monitoring of legacy pollution such as mercury and PCBs will document much more pollution than is currently recorded. The Sierras produce more than a third of the state's drinking and irrigation water. About 1/4 of the state's power is produced through Sierran hydro-electric facilities. Therefore the upper watersheds deserve a bit of attention in this work plan.

Third point- the budget seems low. The budgetary constraints at the CVRWCB and other agencies may limit their assistance to the consultant. I would guess that Task 2 is more like a $50,000 "stand alone" task.

- Task 3: This budget seems low and might need to better reflect the lack of time and budget resources at the CVRWCB and other agencies to assist the consultant. I would guess that Task 3 is more like a $75,000 task if it were a "stand alone" budget.
- So now we're probably out of money beyond the initial (CUWA-SRCSD) commitments.

New Comments on the "Workplan (for the) Development of Drinking Water Policy Central Valley Region Basin Plan:

The tasks 4-10 confuse me for two reasons. First, I don't understand their purpose. And secondly, I don't understand why the work group is proposing to undertake monitoring without better coordination with, and direction from the CVRWQB staff. The CVRWQCB is the lead agency for Basin Plan Amendments. Adopting the CVRWQCB's watershed-based and BMP-based approach, identifying the CVRWQCB's **drinking water** constituent data and modeling needs, and coordinating with other groups who are seeking funding for the Central Valley Board to accomplish the CVRWQCB's assessment and basin planning responsibilities could be a more effective course of action than "going it alone" with new data bases and new monitoring programs, etc. Other groups working on similar issues include the TMDL PAG (working statewide) and stakeholders working on ag and timber waiver program development for Region5 (the Central Valley region).

Is the purpose of Tasks 4-10 to develop information leading to the addition of new constituents that are not listed either in the CALFED ROD or in the current 201 page

"Central Valley Regional Quality Control Board Watershed Management Initiative Chapter" as drinking water impairments?

The *"Central Valley Regional Quality Control Board Watershed Management Initiative Chapter"(WMI, 1-19-01)* is the CVRWQCB's guiding strategy document and it is available at http://www.swrcb.ca.gov/rwqcb5. This document is a voluminous assessment of pollution sites, sources and threats to the 22 beneficial uses that the regional and state boards are responsible for assessing and protecting under the Clean Water Act.

Numerous water quality and beneficial use impairments are already identified in the WMI **but the specific links to drinking water impairments are not well developed or documented**. Please see pages 18-46 and pages 140-142 and pages 178-181, of the *"Central Valley Regional Quality Control Board Watershed Management Initiative Chapter"* and about 75 pages of appendices for more information. This maybe the most fruitful effort for us to undertake given our limited resources. Total CVRWQCB monitoring needs are summarized on page 50 of the WMI. For surface water monitoring across the region, the annual needs are 26.5 PYs and $5,275000. For ground water, the annual needs are 35PYs and $14,000,000. The total CVRWQCB WMI monitoring program for 2001 is 61.5 PYs and $19,275,000. So where does our one consultant and our $150,000 make the most difference?

Or is the purpose of Tasks 4-10 to find those polluters who are responsible for not achieving the difference between ambient water quality and the CALFED ROD goals and to make polluters comply with the ROD Delta Drinking Water Goals through a basin plan amendment?

The CVRWQCB summarizes its standards relating to drinking water quality and discusses the CALFED ROD targets on pages 179 and 180 of the *"Central Valley Regional Quality Control Board Watershed Management Initiative Chapter"*

- For organic carbon the ROD goal is 2-4mg/L. TOC at the Banks Pumping Plant ranges from 2.5 to 9.6 mg/L with a median 4mg/L value. Pollutant peaks appear to be flood sensitive.
- For Bromide the ROD goal is 50 to 150ug/L. Bromide at the Banks Pumping Plant ranges from 50 to 650 ug/L in dry periods when saltwater intrudes further into the Delta.
- For TDS, the CALFED ROD goal is less than 220 mg/L as a 10 year average and less than 440mg/L as a monthly average. At the Banks Pumping Plant, TDS ranges from 94 to 466mg/L with a median value of 286 mg/L.
- For Turbidity, the ROD goal is 50ntu. Turbidity @ the Banks Pumping Plant varies from 3 to 60ntu, peaking during and after floods.
- Giardia and cryptosporidium were not detected at the Banks Pumping Plant in 1996.

The question for me is, how cost-effective is it to focus our attention and resources on: (1) finding the incremental pollutant sources that make up the difference between

ambient levels at Banks and the ROD goals and (2) proving which polluters in the 27,210 square mile Sacramento Basin or the 15,880 square mile San Joaquin basin or the 10.5 million acre Tulare basin are responsible for the differences between the ROD goals and the ambient pollution levels during specific dry or flood peak pollution periods? This monumental "needle in the haystack problem" is why I believe that the CVRWQCB has emphasized the BMP -based watershed management approaches for controlling pollution over the "find and fine" approach to source control in the Central Valley region. Watershed wide, on-site pollution containment and treatment is probably the most practical pollution control strategy for such a vast and unpopulated landscape.

Or is the purpose of tasks 4-10 to develop information on pollutants that are not only not listed as impairing drinking water, but they are not listed as impairing any of the 22 beneficial uses or they are not even listed as detected pollutants at all by the CVRWQCB? This is an enormous task that is truly starting from scratch.

In conclusion, I feel that it is premature to commit to tasks 4-10 until we discuss the overall program that is outlined in the DWQP Strategic Plan in more detail. I feel that Tasks 1-3 should concentrate on helping the CVRWQCB staff to develop better linkages between the 21 other beneficial use impairments and drinking water beneficial use impairments in the next basin plan amendment. I feel that Tasks 1-3 should concentrate on helping the CVRWQCB staff to designate a broader range of pollutants than are currently listed in the CALFED ROD or the WMI as drinking water impairments in the next basin plan amendment. And finally, I feel that the CVRWQCB should take the lead in suggesting the most effective way for our group and our consultant to accomplish Tasks 1-3 in the next basin plan amendment.

Reiteration of previous comments
Finally, my last comment is on the **DWQP Strategic Plan Structure**. This is an excellent effort, and I suggested one change at the 1-31 DWS meeting. I recommend that "Other Local Sources" be its own section and that it not be folded into section 6.5 "Local/Regional Source Water Exchanges"

Thanks for getting us all thinking and thank you for the opportunity to comment.
Sincerely, Leah Wills