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Memorandum

Date: August 23, 2002
To: California Bay-Delta Public Advisory Committee
From: Greg Gartrell and Marguerite Young, Co-Chairs
Drinking Water Quality Subcommittee

Subject: Subcommittee Recommendation – Action: Adopt a recommendation to CALFED on a Framework for a Policy on drinking water quality and CALFED Projects and Actions

Summary

Summarize purpose and issues. (1 paragraph)

Recommended Action:

The Drinking Water Quality Subcommittee recommends the Committee adopt a recommendation to CALFED to develop a policy, based on the Framework discussed below, for assuring continuous improvement in drinking water quality as CALFED Projects and Actions are developed.

Background

As projects and actions move forward under the CALFED Program, it will be necessary as part of the environmental documentation and planning processes to identify project or action impacts or benefits to water quality. A CALFED commitment is for a continuous improvement in Delta water quality. While some projects or actions may degrade drinking water quality, others have the potential to improve conditions in this regard. The overall CALFED Program should result in an improvement.

This draft policy framework is intended to guide CALFED planning and implementation to ensure the CALFED target of continuously improving Delta water quality for all uses is achieved. The draft policy framework is not intended to change or replace the existing legal requirements under CEQA and NEPA for review and identification of project impacts and mitigation for significant impacts. The draft policy framework is consistent with the CALFED EIR/EIS, which discusses at length potential impacts to water quality from projects in other program elements (Chapter 5.3). An eventual policy based on this

CALFED Agencies

California

The Resources Agency
Department of Water Resources
Department of Fish and Game
The Reclamation Board
Delta Protection Commission
Department of Conservation
San Francisco Bay Conservation
and Development Commission

California Environmental Protection Agency
State Water Resources Control Board
Department of Health Services
Department of Food and Agriculture

Federal

Department of the Interior
Bureau of Reclamation
Fish and Wildlife Service
Geological Survey
Bureau of Land Management
Environmental Protection Agency
Army Corps of Engineers

Department of Agriculture
Natural Resources Conservation Service
Forest Service
Department of Commerce
National Marine Fisheries Service
Western Area Power Administration

framework should be used to help develop linkages and priorities in the water quality strategic plan.

The purpose of this policy framework is to guide the implementation strategy of the CALFED Program as projects and actions are implemented. In some instances, it will be found that projects and actions under the CALFED program will adversely affect water quality while providing benefits in other important areas. In some cases, the project or action itself may be able to provide mitigation measures to avoid or offset these impacts. In other cases, the project or action may have to rely in whole or in part on other parts of the CALFED Program to ensure water quality improvement goals are met. In addition to alternatives (that would avoid impacts or result in water quality improvements) and mitigation measures (that would reduce impacts) for projects and actions, CALFED should consider bundling projects for implementation to ensure water quality improvement goals are met.

This policy framework was considered and discussed at the June 28, July 26 and August 23 Drinking Water Subcommittee meetings and recommended for consideration at the BDPAC meeting on August 23, 2002. Comments from the discussion have been incorporated into the recommendation.

RECOMMENDED POLICY FRAMEWORK

1. All projects or actions under CALFED should identify, as part of the planning process and as part of the CEQA/NEPA compliance process, water quality impacts and benefits of the project or action. . This should be a technical evaluation based on the best information available. This evaluation should include impacts of either a continuous or intermittent nature, the magnitude of the impacts, and the ultimate effect on Delta water quality and drinking water quality. For this policy, the primary constituents of concern are pathogens, organic carbon, bromide, salinity, nutrients, taste and odor, and turbidity. In some cases it may not be possible to evaluate water quality impacts due to a lack of information. In those cases, project implementation should include monitoring and adaptive management steps.
2. Where feasible, CALFED projects or actions should attempt to develop reasonable alternatives that still meet the project goals but that avoid drinking water quality degradation or improve water quality. For example, if, by altering the timing of water entering and leaving a wetlands project, seawater intrusion can be reduced rather than increased without affecting the project goals, that alternative should be considered.
3. The information on water quality impacts/benefits, mitigation measures incorporated into projects and potential alternatives for CALFED projects should be considered as part of the CALFED decision-making and implementation process for both the project and the program as a whole. CALFED should endeavor to bundle projects for implementation to ensure that the CALFED target of continuously improving Delta water quality for all uses is achieved.
4. The water quality assessments of projects and actions should include the following:
 - a) The spatial and temporal parameters of linked projects or actions should be explicitly considered, described, and delineated.
 - b) A project's or action's mitigation monitoring plan (under CEQA) may provide a vehicle for monitoring of impacts and implementation of this policy.
 - c) Water supply forecasts from CALFED agencies should provide an accompanying forecast of water quality. Such forecasts include annual or more frequent water supply allocations, as well as long-term or ad hoc planning efforts, such as DWR's Bulletin 160 series (*The California Water Plan Update*) or the Governor's *Critical Water Shortage Contingency Plan*.
 - d) Operational decisions made in CALFED forums or processes, such as the CALFED Operations Groups ("CALFED Ops"), the Water Operations Management Team, and the Environmental

Water Account, should be balanced and should consider water quality impacts on equal footing with water supply and fishery impacts. Operations decision processes should explicitly consider and report impacts to water quality. When such decisions are not protective of drinking water quality, mitigation should be provided for unavoidable significant adverse impacts.

- e) Operational criteria for existing and future surface storage reservoirs should include water quality. For example, water quality should be a legitimate criterion among other traditional reservoir operating criteria, such as power generation, fish and wildlife enhancement, and recreation.
- f) A precise definition of water quality degradation will need to be developed in order to implement this Policy Framework. Factors such as modeling uncertainty, limits of detection, and parameters for determining the degree to which tradeoffs, offsets or mitigation measures compensate for increases of constituents of concern will need to be considered. The CALFED Science Program should be consulted for its recommendations during the development of this definition.

Requested Action

The Committee adopts recommendation to CALFED to develop a policy, based on the Framework discussed above, for assuring continuous improvement in drinking water quality as CALFED Projects and Actions are developed.

Attachments: Subcommittee Memorandum on Framework for a Policy on drinking water quality and CALFED Projects and Actions dated August 23, 2002.

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