

Consolidated Comment on G.Fred Lee's August 16, 2002
Draft "Responses to the CALFED Low-DO Directed Action
Project External Peer Review Panel's Overall Comments"

COMMENTS BY BILL JOHNSTON:

**Comments by William R. Johnston on G. Fred Lee's August 16, 2002 Draft
"Responses to the CALFED Low-DO Directed Action
Project External Peer Review Panel's Overall Comments"**

August 23, 2002

Fred,

Following are my comments to your draft.

PAGE	COMMENT
2 3 rd Bullet	You have a comment that "...the minimum 3 mg/L specified in the draft target may not be protective, where this value should be raised to at least 4mg/L as the minimum that can occur at any time and location". If 3mg/L is okay with the RWQCB staff, I see no reason for you to second guess this and make some other recommendation, particularly in this document. I do not believe the issue of, 3 vs. 4 mg/L, was discussed by the peer reviewers. I recommend you delete this comment.
3 2 nd Paragraph	In the last sentence, I recommend you say that your write-up is being submitted to be used to define the data gaps rather than "it will become the mechanism"
3 3 rd & 4 th Paragraphs	Even though the material covered in the 3 rd and 4 th paragraphs may be correct, I do not believe the paragraphs on "Improving Teamwork" are appropriate for this Peer Review document. I recommend they be deleted.
3 Last Paragraph	You state "It is concluded, however, that further studies of the type that have been conducted in the past will not likely provide the information needed, and that an experimental aeration approach, coupled with modeling and monitoring, will provide this information". Is this comment related to the previous sentence about how loads are affected by flows of 500 to 1200 cfs range or the over all problem? It is not clear. Also, you should specify who concludes this.
6 2 nd & 3 rd Paragraphs	The second and third paragraphs seem to contradict each other in that paragraph 2 says, " With CALFED funding, it is planned, through the experimental aeration studies, to closely integrate modeling with monitoring and evaluation". In paragraph 3 you say the modeling that is being planned is not integrated with the CALFED-supported monitoring and evaluation that has been conducted...." If not inconsistent, maybe a brief explanation should be added to explain.
9 1 st Paragraph	I agree that it is correct to say that there is general agreement that it will be a combination of approaches that will ultimately solve the low-DO problem. However, I recommend that you delete the parenthetical phrase "(such as aeration, load control from the City and upstream and supplemental flow)". I do not agree that there is any general agreement that it will require all of those items to solve the DO problem in the

	DWSC.
9 Dr. Cloern's Comments	You say Dr. Cloern "has misinterpreted the US EPA's Clean Water Act requirements..." It is not clear what you believe Dr. Cloern has misinterpreted. Please clarify. Also, you state "It is believed that there are some on the Steering Committee..." You should say who believes this. Are you agreeing or disagreeing with this statement? However, since these comments are not in italics, it appears they are your responses to an unspecified comment of Dr. Cloern. Maybe you should put the Dr. Cloern comment in which you believe he misinterprets the EPA CWA in italics ahead of your discussion to be consistent with the remainder of your paper.

Call me if you want to discuss any of this.

Bill

COMMENTS FROM TECHNICAL ADVISORY COMMITTEE
MEETING NOTES, SEPTEMBER 10, 2002:

1. The TAC discussed the comments on Fred Lee's Response to Peer Reviewer's comments:
 - a. Editorial comment should be eliminated from the Peer Review response and references to Fred Lee's monitoring plan should be removed since the Peer Review did not review the document.
 - b. Comments regarding "teamwork" should be removed
 - c. U/S sources needs to be quantified
 - d. The Peer Review response should not include new conclusions but should summarize peer reviewers comments.
 - e. Development of the monitoring design is nor part of Task 5.

COMMENTS BY LOWELL PLOSS:

In addition to those submitted by Bill Johnston and the TAC I offer the following comments:

1. Page 1, Last Paragraph. The opening line states "This is an important recommendation....." Please note that this is not a recommendation by the Peer Reviewers.
2. Page 2, Last Paragraph. While there are a number of interesting scientific issues associated with the low DO problem in the DWSC, many of these are not considered high priority to solving the low-DO problem. (Emphasis added) It is not clear who made this conclusion. Is this a Peer Review conclusion? If not then statement should be removed.
3. Page 7, 5th Paragraph. The response to the Ammonia Issue can also be tied back to the PR Comments on Question 2 on Modeling.
4. Page 7, 5th Paragraph. In the same paragraph the statement is made, "The issue that needs to be resolved is whether the 2mg/L ammonia discharge limit,....." Whose issue is this?

5. Page 7, Last Paragraph. The overall wording of this paragraph seems a bit strong as compared to what the Peer Reviewer's recommended.
6. Page 8, 2nd. Paragraph. The Steering Committee's aeration proposal will not evaluate the aeration in combination with other control measures. The Committee's proposal will be to conduct a pilot/demonstration aeration project in addition with upstream studies. Developing control measures is not part of the proposal.
7. Page 8, 4th Paragraph. "The experimental aeration studies are specifically designed to gain further insight....". The experimental design for the pilot aeration project has yet to be designed.
8. Page 8, Last Paragraph. Language appears to imply that Task 5 will design the aeration experiment. This is not the case. Task 5 will develop the scope of work to be followed by the future contractor to conduct the pilot aeration project. It is envisioned the next contractor in collaboration with the Technical Advisory Committee and Steering Committee will design the testing criteria.
9. Page 11, Last Paragraph & Top of Page 12. What is meant by the statement "all are in agreement that algae from upstream sources are a major cause of oxygen depletion in the DWSC. (Emphasis added) Does this mean more than 50 percent, 75 percent, or what? How does this compare to the ammonia load, or DWSC geometry, or low flow?? Algae from upstream sources may be a contributor however the relationship between the upstream contribution and the downstream causes has yet to be determined.