SACRAMENTO
STORMWATER
QUALITY
PARTNERSHIP

140357:EC

October 6, 2014

Peter Goodwin, Ph.D., Lead Scientist
Delta Stewardship Council
Delta Science Program

980 Ninth Street, Suite 1500
Sacramento, CA 95814

via email only: science@deltacouncil.ca.gov

SUBJECT: Sacramento Stormwater Quality Partnership Comments on the Draft Interim Science Action Agenda

Dear Dr. Goodwin:

The Sacramento Stormwater Quality Partnership (Partnership) appreciates this opportunity to provide comments on the September 9, 2014 Draft Interim Science Action Agenda. The Partnership is comprised of the County of Sacramento and the cities of Citrus Heights, Elk Grove, Folsom, Galt, Sacramento and Rancho Cordova that are permittees in the municipal separate storm sewer system (MS4) National Pollutant Discharge Elimination System permit (NPDES No. CAS082597, Order No. R5-2008-0142).

The Partnership performs monitoring and scientific investigation to ensure protection of receiving water beneficial uses and to assess the effectiveness of our management actions. The Partnership's primary objective is to protect receiving water quality, which necessitates that we responsibly prioritize expenditures of our limited resources. Good science, to inform planning for water quality protection and prioritization of resources, is of significant value. The Partnership therefore highly values collaborative science in the Delta as exemplified by programs such as the Delta Regional Monitoring Program (RMP). The Partnership has been an active member of the Delta RMP with participation as a Steering Committee (SC) member, as a Technical Advisory Committee (TAC) member, and by providing partial funding of a TAC co-Chair position. We support Delta Science Program's mission of "One Delta, One Science", and we have provided suggestions below to better support this mission.

"ONE DELTA, ONE SCIENCE" REQUIRES SIGNIFICANT LOCAL AGENCY SUPPORT AND CONSIDERATION

The Partnership's primary concern in reviewing the Draft Interim Science Action Agenda is that significant participation and funding of science that supports local agencies is only lightly addressed. The statewide dependency on reliable Delta water supply and water quality has put additional demands on local agencies without adequately involving them in research and planning. Local agencies have a day-to-day and direct understanding of the Delta ecosystem and Delta science that should be better represented. Without local agency perspectives, Delta science may overlook important aspects during planning solutions.

The draft Bay Delta Conservation Plan (BDCP) included a Conservation Measure (CM19) that was not based on the current understanding of scientific evidence, yet it would require significant actions for local stormwater agencies. As proposed CM19 would not measurably improve downstream water quality. This is one example where involvement from local agencies in collaborative science would have improved the outcome.

Despite providing comments on the Delta Plan, the Delta Science Plan, the BDCP, and other Delta policy documents, the Partnership member agencies were not interviewed or contacted during preparation of the Draft Interim Science Action Agenda. Only one local agency staff member from the Sacramento Regional County Sanitation District (SRCSD) was interviewed.

For adaptive management to be successful and Delta science to be widely accepted, local agencies should have a significant role. For example, the Partnership was a significant contributor to the Central Valley Drinking Water Policy development and supported development of models and research to evaluate the downstream benefits of control measures in the Partnership area. Without this local understanding of the sources, fate and transport, or organic carbon and other constituents, more conservative assumptions would have suggested that more aggressive control of organic carbon was necessary and feasible - though neither condition is true.

Because of the critical importance of the Delta to the entire state, the state should provide significant funding of collaborative stakeholder science and monitoring programs (e.g., Delta RMP).

Page 1, lines 17-20

Because this is an "Interim" Science Action Agenda, it does not include formal direction from a Policy-Science Forum (Delta Science Plan, Appendix B), but it is guided by advice from the Science Steering Committee, a multi-disciplinary advisory committee formed by the Delta Lead Scientist to guide and advise science in the Delta (Delta Science Plan, Appendix D).

We support the formation of a Science Steering Committee, but request that its composition include all stakeholders in Delta Science, including at least one representative for local discharging agencies from the Sacramento urban region.

Page 2, lines 12-16

The Interim Science Action Agenda does not contain an exhaustive catalog of science actions, underway or proposed, that could be taken to improve understanding about the Delta and California's water supply system. The action areas and actions identified in this document also do not represent a prioritization of science actions, nor will they result in the science necessary to inform every possible management or policy decision that could be taken in the Delta.

We appreciate that an all-inclusive list of science actions is not feasible or wholly productive to develop at this time. However, at this planning level step it is necessary to more comprehensively identify known scientific and scientific tool gaps for all stakeholders so that important gaps are not excluded from prioritization. For coordinated and effective management of the Delta, local agencies need credible Delta-scale science tools to support local agency management actions. For example, the Partnership participated for more than eight years on the Central Valley Drinking Water Policy Workgroup, which successfully developed a water quality model to evaluate organic carbon and significantly aided assessment of management scenarios. However, as discussed the Workgroup's Synthesis Report[1] recommendations, revisions and improvements to the model are necessary. The Science Action Agenda should prioritize development of these specific tools for all stakeholders.

Page 3, lines 24-26

They are a summary of priority science actions identified by Delta scientists, managers, and decision makers. They represent the science needed to build the tools, resources and human capacity to be responsive to decision maker's science needs.

The list does not include significant input from the Partnership, as well as other local agency scientists, managers, and decision makers, and we request that it be modified to include local agency priority science actions such as water quality modeling to evaluate local management actions. Tools such as this and a better understanding of the fate and transport of contaminants and the specific effects on beneficial uses are critical to understanding the efficacy of upstream control measures and management actions.

Page 11, lines 7-9

Improved understanding of the sources and drivers of contaminants and their effects consists of research and monitoring actions is needed to inform decision making about ecosystem management and human health and safety.

It is unclear what is intended by the phrase "sources and drivers of contaminants". We recommend clarification that "drivers" includes fate and transport of contaminants from sources, consideration of source contributions, and contaminant effects at the remote Delta locations. The Action Area 10 table "example science actions" does not directly address this stated goal. We support further development of scientific tools and monitoring programs to assess the benefits of management actions on the downstream Delta.

Page 12, Action Item 11 table item No. 1 - Delta RMP

We are encouraged by the inclusion of the Delta RMP in the Draft Interim Science Action Agenda and request a higher level of coordination and participation by the Delta Science Program with the nascent Delta RMP.

"...with a focus of using toxicity as a tool and determining bioavailability of specific pesticides..."

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[1] http://www.waterboards.ca.gov/centralvalley/water_issues/drinking_water_policy/dwp_wrkgrp_synthesis_rpt.pdf

While the Delta RMP is planning on evaluating pesticide impacts on aquatic species, the "focus" of the study has not been established. We recommend omitting this detail because it does not correctly characterize the focus of the study.

Page A-1 - lines 23-33

Based on input and recommendations received at the May 6, 2014 workshop, the Delta Science Program conducted focused expert interviews to further develop the Interim Science Action Agenda. The focused interviews were intended to streamline the collection of various agencies' and organizations' current high-priority science actions. A core set of questions was asked for each interview (Appendix B), and the responses were compiled into a spreadsheet. Shortly after each interview, the interviewee(s) were provided with an opportunity to review, clarify, edit, or comment on the Delta Science Program's summary of their responses. Interviewee(s) were also informed that full interview responses would likely be appended, and may or may not be included in full within the Interim Science Action Agenda. Of the agencies and organizations that were invited to participate in the interview process, approximately 81% responded and were interviewed. In total, 21 interviews were conducted (Table A-1).

As discussed previously in this letter, the only local agency interviewed was SRCSD. We request that additional local agencies be included so that the mission of "One Delta, One Science" can be better achieved. Local agencies are stewards of natural resources and are committed to protecting these resources when the science supports management and control measures as effective and necessary.

Please let us know if you have questions or would like more details on our recommendations for local participation in Delta science and management.

Sincerely,

Dana Booth, P.G., QSD
Program Manager - Stormwater Quality
Sacramento County Department of Water Resources
(916) 874-4389
BoothD@SacCounty.Net

Sherill Huun, P.E.
Supervising Engineer
City of Sacramento Department of Utilities
(916) 808-1455
SHuun@cityofsacramento.org

cc: Randy Fiorini, Delta Stewardship Council Chair
Jessica Pearson, Delta Stewardship Council Executive Director
Chris Fallbeck, City of Citrus Heights
Darren Wilson, City of Elk Grove
Sarah Staley, City of Folsom
Bill Forrest, City of Galt
Brit Snipes, City of Rancho Cordova
Jim Peifer, City of Sacramento Department of Utilities