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Subject: Comments on the Delta Independent Science Board Water Quality Review Draft Proposal
Date: Tuesday, August 11, 2015 5:37:28 PM

Thank you for the opportunity to comment on the Delta Independent Science Board (DISB) Water Quality Review Draft Proposal. An independent evaluation of the scientific basis for assessing water quality in the Sacramento-San Joaquin Delta (Delta) and how this data are being used is invaluable to the Delta Regional Monitoring Program (RMP) and the Central Valley Regional Water Quality Control Board.

We have the following comments and recommendations:

1. Constituents of emerging concern may have significant impacts to Delta water quality. We recommend this pollutant category be added to the project scope. In addition, dissolved oxygen is an important water quality issue in the Delta and should be added to the project scope.
2. The scope of the review includes nutrients. Water Board staff have taken the recommendation of the Delta Stewardship Council and formed science work groups to evaluate whether the increase in cyanobacteria blooms and macrophytes and the decrease in algal biomass and shift in algal species composition in the Delta is the result of long-term changes in nutrient concentrations and loads entering the system. White papers and an independent external scientific review of the recommendations of the science work groups will be available in the spring of 2016. The Regional Water Board intends to use the recommendations of the white papers and follow up research to determine whether additional nutrient management is needed in the Delta. An independent assessment of our approach and the recommendations of the science work groups would be helpful. The DISB assessment should include recommendations on how the State should prioritize funding for future research between nutrients and other constituents as there is limited money.
3. Similar to the previous comment, it would be beneficial for the DISB not to become too compartmentalized between “water rights” and “water quality” or “habitat” issues since it is often the same agencies allocating scarce resources in looking at stressors related to both. For example:
 - a. While temperature is largely a water quantity issue, it effects dissolved oxygen and is very important ecologically
 - b. Sediment, physical habitat and biological condition may be as ecologically important as contaminants.
4. Either include salinity and temperature in the review or include an explanation in the proposal addressing why these will not be reviewed.
5. Please consider adding the following to the list for the intended audience:

- a. Municipal and county Stormwater programs
- b. US Environmental Protection Agency (USEPA)
- c. Department of Pesticide Regulation (DPR)
- d. Department of Water Resources (other DWR programs in addition to IEP)
- e. Army Corps of Engineers (dredging projects)

Please consider adding the following to the list for agencies that have water quality data and other information:

- a. Department of Pesticide Regulation
- b. Department of Water Resources
- c. The Sacramento Stormwater Quality Partnership (SSQP), and the City of Stockton and County of San Joaquin (large Municipal Stormwater agencies)
- d. Irrigated Lands Regulatory Program Coalitions in and adjacent to the Delta.

Again, thank you for the opportunity to comment.

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