

August 12, 2015

Delivered via E-mail to: kelly.souza@deltacouncil.ca.gov

Delta Independent Science Board
c/o Ms. Kelly Souza
Senior Environmental Scientist
Delta Science Program
Delta Stewardship Council
980 Ninth Street, Suite 1500
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Subject: Comments on the Delta Independent Science Board Draft Water Quality Review Proposal

Dear Members of the Delta Independent Science Board:

The State Water Contractors (SWC)¹ appreciates the opportunity to provide comments on the Delta Independent Science Board (Delta ISB) Draft Water Quality Review Proposal. Water quality contaminants can affect aquatic wildlife, drinking water, and water supply beneficial uses of water, and are an important stressor of concern in the Sacramento-San Joaquin Delta (Delta). As stated in the Draft Proposal, there is not a comprehensive contaminants monitoring and assessment program for the Delta at this time, and this is a key gap where additional scientific information is critically needed to support management decisions. The Delta Regional Monitoring Program (Delta RMP) initiated pesticide monitoring in July, and the Delta ISB review will be informative as the Delta RMP considers expanding its scope in the future. The SWC appreciates your efforts to conduct this important review to assess current water quality programs and develop recommendations for changes or enhancements to existing water quality monitoring and assessment programs that will provide information that is sufficient to support management decisions.

Scope

The Draft Proposal is brief and it is not clear how the Delta ISB will approach this review. The SWC recommends that the Delta ISB start with identifying key management decisions and water quality management programs for the Delta, and review and evaluate the water quality information that is needed to inform the decisions. The review should consider the constituents that should be monitored, the spatial and temporal extent of monitoring, the type of water quality monitoring (e.g., discrete grab samples, continuous monitoring stations, toxicity testing, etc.), the ancillary parameters that should be part of monitoring programs, and both baseline monitoring needs and special monitoring studies.

¹ For a description of the State Water Contractors see Attachment 1.



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The Delta ISB review should also address areas where technology development will be helpful for meeting water quality monitoring objectives (e.g., development of a reliable monitoring probe for ammonium able to accurately detect at concentrations below 1 μ M).

The SWC supports the focus of the review on chemical contaminants, nutrients and pathogens. For chemical contaminants, and in particular for currently used pesticides, there is not sufficient information to understand the ecological impacts of the contaminants on the Delta ecosystem or to inform management actions. Contaminants, as single constituents or as mixtures, can cause acute and chronic effects on aquatic fish and wildlife in the Delta. The ecological impacts of contaminants in the Delta remain largely unquantified, and this impairs the development of management programs and management decisions. Measuring concentrations of these contaminants should be paired with biological testing to help understand the effects of the exposure to contaminants, individually or in combinations, on organisms and the ecosystem. The San Francisco Bay and Central Valley Regional Water Quality Control Boards are moving forward on nutrient science plans and management strategies, and recommendations addressing nutrient monitoring are important for those processes. Finally, the Delta RMP includes a pathogen monitoring study as part of its first year of monitoring, with the intent to characterize pathogen levels in the Delta. This is a new monitoring activity in the Delta, and the Delta ISB review will be helpful for evaluating the pathogen monitoring results and developing next steps.

The Draft Proposal also states that the review will not address salinity or temperature as water quality issues. The Draft Proposal should explain why salinity and temperature will not be addressed. We understand that the Delta ISB cannot review all water quality programs, but salinity is a broadly monitored constituent, and including a look at salinity monitoring programs may be informative for developing recommendations for other constituents.

Intended Audience

There are many stakeholder groups interested in Delta water quality, and since the Delta ISB is planning to consider drinking water quality, we recommend the intended audience list include drinking water and water supply agencies, and the Division of Drinking Water at the State Water Resources Control Board (SWRCB). Other agencies to include are the Department of Boating and Waterways due to their role in managing aquatic macrophytes, and the Department of Pesticide Regulation due to their role in regulating the use of pesticides in the state.

Constituents/Agencies from which the Delta ISB will Request Information

The list of agencies should be expanded to include those agencies involved in drinking water quality issues, both for monitoring drinking water constituents and using the monitoring information for management decisions. These agencies include the Division of Drinking Water at the SWRCB, and the Department of Water Resources, Municipal Water Quality Investigations program and Operations and Maintenance (O&M) water quality monitoring for the State Water Project.

The regulated dischargers to the Delta are also a source of water quality monitoring information that is important for informing management decisions. The list in the Draft proposal includes the

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Sacramento Regional County Sanitation District. We recommend that rather than identifying one discharger as a source of data, the Delta ISB should review monitoring information from municipal wastewater and stormwater discharges, and from agricultural discharges that are being monitored as part of the Irrigated Lands Regulatory Program.

Expected Outcomes

In addition to evaluating whether appropriate water quality parameters are being measured, we recommend that the Delta ISB evaluate if the parameters are being monitored at sufficient frequency and locations to inform management decisions.

Projected Timeline

We request that the draft schedule for the Delta ISB water quality review include a step for stakeholder review and comments.

We believe the Delta ISB review of water quality programs will be a valuable document that will inform the development of, and funding for, important water quality monitoring programs. We look forward to providing input to this review as it moves forward.

Sincerely,



Stefanie Morris
Acting General Manager

Attachment 1

State Water Contractors, Inc. (SWC): The SWC organization is a nonprofit mutual benefit corporation that represents and protects the common interests of its 27 member public agencies in the vital water supplies provided by California's State Water Project ("SWP"). Each of the member agencies of the State Water Contractors holds a contract with the California Department of Water Resources ("DWR") to receive water supplies from the SWP. Collectively, the SWC members deliver water to more than 25 million residents throughout the state and more than 750,000 acres of agricultural lands. SWP water is served from the San Francisco Bay Area, to the San Joaquin Valley and the Central Coast, to Southern California. The SWC's members are: Alameda County Flood Control and Water Conservation District Zone 7; Alameda County Water District; Antelope Valley-East Kern Water Agency; Casitas Municipal Water District; Castaic Lake Water Agency; Central Coastal Water Authority; City of Yuba City; Coachella Valley Water District; County of Kings; Crestline-Lake Arrowhead Water Agency; Desert Water Agency; Dudley Ridge Water District; Empire-West Side Irrigation District; Kern County Water Agency; Littlerock Creek Irrigation District; Metropolitan Water District of Southern California; Mojave Water Agency; Napa County Flood Control and Water Conservation District; Oak Flat Water District; Palmdale Water District; San Bernardino Valley Municipal Water District; San Gabriel Valley Municipal Water District; San Geronimo Pass Water Agency; San Luis Obispo County Flood Control & Water Conservation District; Santa Clara Valley Water District; Solano County Water Agency; and Tulare Lake Basin Water Storage District.