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Sent via email to kelly.souza@deltacouncil.ca.gov

Subject: Regional San’s Comments on the DISB Water Quality Review Draft Proposal

Dear Members of the Delta Independent Science Board:

Thank you for the opportunity to review and comment on the draft Water Quality Review Proposal.

We appreciate the proposal’s focus on assessing current water quality trends in the Delta and investigating how adaptive management can be used to direct future research directions and inform future management decisions. This review comes at a time when many monitoring, research, and modeling activities are converging to make adaptive management more feasible.

Regarding the scope of the review, we agree that many previous Delta water quality discussions have been directed at understanding changes in salinity and temperature, but this is partially due to the significant control that these factors can impart on Delta ecosystems. Because, in your water quality review, you plan to investigate how water quality may be altered by future changes in water conveyance or climatic conditions, it would be beneficial to acknowledge the potential effects that these changes can pose on water temperatures and salinity. Alternatively, it would be helpful to describe briefly the reasoning for omitting salinity and temperature from the review.

We recommend that your water quality review include a section to summarize the existing programs in the Delta that deal with water quality regulation and management, prior to evaluating whether current water quality consideration is adequate to protect Delta ecosystem health. Some examples of current water quality protection programs in the Delta include NPDES permits, 303(d) listings, TMDLs, irrigated land Waste Discharge Requirements Orders, Central Valley Salinity Alternatives for Long-Term Sustainability initiative (CV-SALTS), the Bay-Delta Plan, the Sacramento-San Joaquin Water Quality Control Plan (Basin Plan), and the Drinking Water Policy.

The Delta ISB water quality review will help place the Delta Regional Monitoring Program (DRMP) in the context of other water quality monitoring programs, and will hopefully increase collaboration and involvement among the different monitoring programs and participants. When describing the organizations currently involved in the Delta RMP, it would be informative to list the participants by their general

categories; Regulatory (Central Valley Regional Water Quality Control Board, USEPA) Water Supply, Municipal Drinking Water, Stormwater, Coordinated Monitoring Programs (IEP), Publicly Owned Treatment Works (POTWs), and Irrigated Agriculture. Important contributions to the DRMP process are also provided by consultants and facilitators, contracted by one or more participating groups. In the future, the DRMP hopes to expand and include other organizations and scientific interests in the Delta Community.

The intended audience list could be expanded, since it is likely that many organizations would benefit from the knowledge synthesized in your water quality review. This includes the US Army Corps of Engineers, Water Districts that rely on exported Delta water, the California Department of Toxic Substances Control, the Department of Pesticide Regulations, and environmental NGO's, such as TNC and the Bay Institute, and a wide variety of other stakeholders in the San Francisco Bay area.

Regarding information sources, many organizations deeply involved in evaluating Delta water quality were included in the draft outline, but the review would likely benefit from the broadest possible representation of Delta water quality stakeholders. Therefore the DISB might want to include information from the California Department of Pesticide Regulation, the California Department of Fish and Wildlife Water Branch, the UC Davis Center for Watershed Sciences, the County of Sacramento Stormwater Division, the California Farm Bureau, and other agricultural industry representatives. The Drinking Water Policy Work Group developed a Synthesis Report on Delta drinking water issues in 2012, which would be informative to this review; available online at:

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

The list of other current Delta Water Quality review efforts should also include the ongoing work of the Central Valley Regional Water Quality Control Board, along with numerous stakeholder representatives, to review the state of the knowledge on the potential effects of nutrients on Delta Water Quality. This effort will culminate in the Delta Nutrient Research Plan, and an associated Request for Proposals in 2016.

Overall, we believe that the DISB Water Quality Review will be a valuable assessment of the current water quality monitoring programs in the Delta and we anticipate that it will provide guidance on how to incorporate adaptive management techniques into future monitoring efforts to generate the best available science to guide regulatory and management practices forward.

For further information, please contact Timothy Mussen at 916-875-4344 or via email at mussent@sacsewer.com.

Respectfully submitted,



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Chief Scientist

Respectfully submitted,



Timothy Mussen, Ph.D.
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