July 19, 2016

Felicia Marcus, Chair
Members of the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Integrating Delta Science

Dear Chair Marcus and Members of the Board:

The broad coalition of undersigned public water agencies and water companies serving a significant part of urban and rural California call on the State Water Resources Control Board (State Water Board) to formally engage the Delta Science Program in a robust and rigorous process to both develop and review the scientific basis for Phase II of the Bay-Delta Water Quality Control Plan (WQCP) update. We strongly encourage this engagement prior to the release of a draft or proposed scientific basis report. As we have seen from past experiences, a successful and credible WQCP process will utilize and rely upon the best available data and science that is both developed and peer-reviewed through an independent and scientifically focused entity, such as the Delta Science Program.

The Delta Reform Act of 2009 established the Delta Science Program and the Delta Independent Science Board to formally advance the concept of *One Delta, One Science*. "The mission of the Delta Science Program [is] to provide the best possible unbiased scientific information to inform water and environmental decision making in the Delta. That mission shall be carried out through funding research, synthesizing and communicating scientific information to policymakers and decision-makers, promoting independent scientific peer review, and coordinating with Delta agencies to promote science-based adaptive management. The Delta Science Program shall assist with development and periodic updates of the Delta Plan's adaptive management program." (Water Code §85280(b)(4).)

The California Water Action Plan (Action Plan) further elaborated that "the administration will direct relevant agencies and departments to work with the Delta Science Program, the Interagency Ecological Program, and others conducting science in the Delta to implement the Delta Science Plan, committing resources and funding for shared science to achieve integrated, collaborative and transparent science to enhance water and natural resource policy and management decisions." (Page 21.)

The Action Plan also adds that "a coordinated approach to managing the Delta is essential to serve the needs of California's residents. State agencies will commit to using collaborative processes to achieve water supply, water quality and ecosystem goals. This approach embraces enhanced sharing of data, consistent use of peer-reviewed science, coordinated review under the California Environmental Quality Act, improved integration of related processes, and encouragement of negotiated resolutions." (Page 20.)

A completely independent process, such as one conducted by the Delta Science Program and envisioned in the Delta Science Plan (*see* e.g., Appendices H and I), is essential for two reasons. First, as the Public Policy Institute of California has noted, the scientific problems presented in the Delta watershed are "wicked" problems, in that they involve the intersection of different bodies of scientific knowledge, areas where there is great uncertainty about the physical and biological processes involved, and areas where conditions are changing rapidly. Adding to the complexity of these questions, California is now squarely confronting the challenge of climate change in trying to weather a 1,200-year drought. The complexities and uncertainties associated with climate change make a difficult problem even harder. For such complicated problems, robust peer review of proposed approaches–even before a draft report is written–is essential to ensure that the best available scientific and commercial information is used as part of the scientific basis report.

Second, robust peer review assures skeptical members of the public that, despite the complexities of the Delta ecosystem, the State of California is committed to analyzing the Delta ecosystem without preconceptions and without ideological or political biases. An honest, straightforward discussion of scientific principles and uncertainties is called for by the Delta Reform Act and the California Water Action Plan. The Delta Science Program, which has the support of various State agencies, is best situated to conduct this intricate and essential review of the scientific basis for the WQCP process.

California needs a progressive approach to science that will empower 21st century water resources management to support a vibrant economy and environment. This type of rigorous and transparent scientific process with independent and objective input and review is critical to build a strong scientific foundation for California to address our water management challenges.

We look forward to discussing this approach envisioned by the Action Plan and the legislation with you in more detail at your earliest convenience.

Sincerely yours,

Terry Erlewine
State Water Contractors

David Guy
Northern California
Water Association

Jason Peltier
San Luis and Delta-Mendota Water Authority

Jeffrey Sutton
Tehama Colusa Canal Authority

John Woodling
Regional Water Authority

cc: Tom Howard
Randy Fiorini
Jay Lund
Jessica Pearson
Michael George