



Coalition for a Sustainable Delta

July 18, 2013

VIA E-MAIL

Delta Science Program
science@deltacouncil.ca.gov

Re: Comments on First Draft Delta Science Plan

The Coalition for a Sustainable Delta is a California nonprofit corporation comprised of agricultural, municipal, and industrial water users, as well as individuals in the San Joaquin Valley. The Coalition and its members depend on water from the Sacramento-San Joaquin Delta (Delta) for their continued livelihood. Individual Coalition members frequently use the Delta for environmental, aesthetic, and recreational purposes; thus, the economic and non-economic interests of the Coalition and its members are dependent on healthy and sustainable Delta ecosystems.

The Coalition has been materially involved in research, regulatory activities, and court actions for the purpose of advancing its interests in a sustainable Delta capable of supporting native fishes and providing adequate water supplies for water users in the San Joaquin Valley. On numerous occasions, the Coalition has submitted written comments and made oral presentations on drafts of the Delta Stewardship Council's Delta Plan.

The Coalition appreciates the opportunity to offer comments on the first draft Delta Science Plan. The scope and breadth of the effort is impressive. Overall, it is well reasoned, especially in addressing the multiple portals through which science meets and informs policy and management. The draft Plan underscores the essential role of science in adaptive management, the primary vehicle by which Delta environmental resources policy intersects with management action to realize the conservation and restoration of the Delta's embattled ecosystems.

We believe subsequent drafts of the Plan can be strengthened in two respects, both of which would complement the existing components of the Plan.

First, throughout the draft Plan, we encourage greater and focused consideration be given to the role that the full range of stakeholders and interested parties may play in Delta science, particularly those parties with the ability to contribute to both (i) the body of empirical data, analyses, and findings that may inform resource management in the Delta and (ii) the assessment and synthesis of that research in order that it properly informs resource policy. The Coalition, like a number of other interested parties, has developed substantial capacity in the sciences, which enables it to contribute meaningfully to the Delta science strategy.

In addition, in subsequent drafts of the Plan, we encourage you to give careful consideration to recognizing explicitly the appropriate role of the public agencies that have contracts with the federal and state governments for the delivery of water from the Central Valley Project and

State Water Project on both the Science-Synthesis Team and Policy-Science Team. This is particularly appropriate in light of the role of those governmental entities in resource management in the Delta, including financing and planning the Bay Delta Conservation Plan. We also believe there is a role for the Coalition and other entities that can offer sufficient scientific capacity to the Science-Synthesis Team.

Second, we urge you to give greater consideration to the multiple, distinct roles that independent science review may play in the interpretation and application of scientific information into effective, efficient, and accountable policy development and decision-making in the Delta. The draft Plan describes the Science Program as taking a leadership role in review of proposals, processes, programs, plans, and products. This maybe both too ambitious and too amorphous at the same time. Given the sheer volume of activity in the Delta, the Science Program undoubtedly will be required to prioritize those proposals, processes, programs, plans, and products that merit attention. Appendix 1 to the draft Plan provides the Science Program with factors to consider when deciding whether to provide a review. But, it does not explicitly incorporate consideration of the likelihood that a given review will actually serve to inform subsequent action in a manner that improves the quality of decision-making in the Delta.

One distinct role independent science review can play in the development of reliable knowledge and facilitating the promulgation of best available science would be through the employ of review panels appointed to critically assess and synthesize data, results, and findings that could inform resource management decisions in an area where two or more parties have widely divergent views. Each of the parties would be afforded an opportunity to submit information to the panel (in writing, in the form of live presentations, or both). In some cases, the panel could issue a draft report for review and comment by the parties before it is finalized. In other cases, the panel may simply issue a single, final report. The parties seeking the review could be required to fund all or a portion of it. To the extent that independent science review occurs in this particular context, it is likely that such review could inform subsequent actions in a manner that improves the quality of policy decisions and decision-making in the Delta.

To further increase the likelihood that interested parties will take heed of independent science reviews generated by the Delta Science Program, we encourage you to seek the commitment of parties seeking or subject to those reviews to give due consideration to such reviews and to consider adjusting their efforts to the extent such action is recommended by reviewers.

Thank you for the important work you are doing on the Delta Science Plan. We look forward to continuing to work with you to develop a robust and durable plan.

Sincerely,



William D. Phillipmore
Board Member

WDP:pt