

CALAVERAS COUNTY WATER DISTRICT

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16 September 2013

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Dr. Peter Goodwin
Delta Science Program
980 Ninth St., 15th Floor
Sacramento, Ca. 95814
Via email:
science@deltacouncil.ca.gov

RE: Second Draft Delta Science Plan Comments

Dear Dr. Goodwin:

Calaveras County Water District appreciates the opportunity to review and comment on the Second Draft Delta Science Plan and thank you for your consideration. Our agency has participated in the Delta Stewardship process throughout the various plan draft versions, the CEQA process and the development of a regulatory program. We have also followed the work of the Delta Science Program and believe the key to meeting the requirements of the Delta Reform Act will be **an active and engaged Council** supported by a **rigorous Delta Science Program monitoring and reporting**. Both of those key elements are essential for implementing a successful adaptive management strategy and requisite for continued support and creditability of the plan.

Calaveras County Water is uniquely invested in the process. As the resource managing agency overlying three riverine watersheds, two of which contribute directly to delta flows and the third is significant in balancing a healthy ecosystem on the San Joaquin system. We have substantial history, science and future plans well vested in these watersheds which must be respected and integrated as other plans emerge.

The primary purpose of the Delta Science Program is to inform, advise and generally support the policy actions and regulatory authority of the Council. The Council itself is to work to achieve the co-equal goals, protect the Delta as an evolving place and to utilize the best available science within the doctrine of adaptive management (CWC§85052).

Our agency is one of your audiences identified in the Second Draft (page iii) and would use the Delta Science Plan to: a) provide input on priority Delta science activities; b) engage with the Delta science community and its activities and; c) enhance connections among Delta policy, management and science communities.

Our primary area of interest, due to our location within the Delta watershed, but not within the Delta itself, is that of helping the Council and the Delta Science Program better integrate the program with the upstream foothill and Sierra

Nevada ecosystem agencies, communities and their long term plans and investments which are maturely rooted and on-going.

“One Delta, Once Science” expressed in the Plan is a laudable theme but we caution you that the vast areas captured in the Delta watershed and upstream Sierra Nevada Ecosystem dictate that the “one science” be a comprehensive “one science” and not one which only relies upon Delta scientists and experts. The integration of diverse areas of expertise and disciplines will be critical to achieving the mission of the Science Plan and ultimately the Council. While it is understandable that there will be a desire by the Science Program to focus on the Delta it is essential that the Delta Science Program encompass the Delta watershed area and that early “pairing” of science programs be incorporated as well. There must be a full commitment of funding for a comprehensive perspective or the distinctively variable components of science, culture and finance will be muddled as indistinguishable gradients of grey which will undermine the credibility of any conclusions. We openly question the commitment to provide adequate funding to meet the high standards and commitments aspired to by the Delta Science Program. **Partial work on this endeavor is unsatisfactory and undermines the values and the basis for our cooperation.**

We agree with the notion of “...an open science community...” as described on page 1 of the Plan. However, for that to function effectively there is no automatic or “natural” scientific connectivity between an in-Delta science focus and those out-of-Delta science efforts. The Delta Science Plan must reach out to those **existing, ongoing research and monitoring programs** external of the Delta to capture their perspective and knowledge of **the Delta watershed**. That should be a key strategic objective of the Science program and reflected in addressing the larger scale processes, functions and stressors outside the (primary) Delta geographic focus that nonetheless influence the Delta.

For example, achieving the objectives of CWC§85021 and the anticipated increased regional self-reliance for regions that depend upon water from the Delta watershed will require a sound scientific understanding of what natural and human influences may bring that to fruition. This in turn will require a monitoring and evaluation program that is up to the task of being able to quantify and, through the use of adaptive management, provide the Council with information and valid assumptions about what is the best way to bring that objective about.

We believe this should be incorporated into the Delta Science Plan objective to Identify, Maintain and Advance the ‘State of Delta Knowledge’ as described on page 8 of the Plan. Clearly this is a critical element for organizing science so as to better inform policy and management. We suggest that this “Delta looking outward” perspective should be represented within the Delta Policy-Science Forum by qualified scientists who have expertise regarding the Delta watershed. This is recognized somewhat on page 17 of the Plan in lines 6-11, but we are unsure of what scale and scope these comments encompass. There is a saying that “what you don't know about you can't measure” and we believe it is applicable to that section of the Plan. “System –level progress” will require system-level knowledge and system-level adaptive management.

Within that context the term Delta System is used within the document as is the term Delta Ecosystem and Delta Watershed. Absent the requisite glossary to

know what the differences are in those terms, the reader is confused about what geographic area and/or combination of natural and man-made infrastructure the document makes reference to. We are encouraged by the broad book-ends described as a category of science to support the Coequal goals (page 20) under "Sierra to the sea" but there must be a Sierra science program paired with the Delta science for that to become reality.

Page 25 lines 26-29 we suggest these specific amendments:

"A shared strategy for integrated monitoring to address Delta ecosystem and water management needs does not exist. Monitoring needs span a wide range of data types including precipitation, temperature, infiltration, runoff, stream flows, land use, land and resource management, and vegetation to native and non-native fish species abundance and distribution and geographic range that goes from the headwaters of Sierra Nevada streams to the Pacific Ocean."

The objectives section on the same page should also be similarly broadened to encompass the subject areas.

Page 26, line 15 should include Local Agency and Integrated Regional Water Management Programs.

Page 26, line 20 should include land and resource management actions.

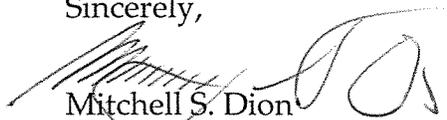
Page 28, lines 9-12 should include the following agencies - United States Forest Service, National Park Service, Bureau of Land Management, Bureau of Reclamation, and Fish and Wildlife Service as well as the U.C. Merced, Sierra Nevada Research Institute.

Page 38, lines 4-15. We concur with the recognition that the Delta Science Plan will need to expand its capacity to facilitate and coordinate Delta Science Plan actions. However, we recommend that supplementing of core staff by "rotators" not only include other organizations and agencies but also those with expertise in areas outside of the Delta consistent with the broad and comprehensive requirements for a science program up to the challenge of a wide-flung ecosystem and watershed.

In summary, we urge that the Delta Science Plan incorporate coordination, communications and a pairing of its science program with other relevant efforts in a manner that will provide the Council with the information needed to assess the progress on the co-equal goals and the compounding factors as applied to one of the largest and most complex ecosystems in the United States. The history of the State orchestrated coordination efforts warrants extraordinary vigilance for those that have historic investment and managing resources in the watershed; we believe in the role of the Council and are cautiously optimistic of success in this endeavor of this size and scope.

We look forward to working with you and the further development of the Delta Science Program.

Sincerely,



Mitchell S. Dion
General Manager
Calaveras County Water District