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SENT VIA EMAIL

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Delta Science Program
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Re: Review of the Delta Science Program's First Draft Science Plan

Dear Members of the Delta Science Program:

The San Joaquin Tributaries Authority ("SJTA") has reviewed the Delta Science Program's ("Program") First Draft Science Plan ("Plan"). The SJTA supports the concept and purpose of the Plan – to create a foundational agreement on science that will guide water and environmental policy in the Delta. However, as currently drafted, the Plan includes an overabundance of information but lacks clarity with regard to goals, action items, independence of process, and allocation of responsibility. The SJTA provides the following specific recommendations which will improve the quality and clarity of the Plan.

Specific Recommendations:

a. Mission Statement Expressing Impartiality

The Plan should include a clear and concise mission statement. This statement should emphasize the Plan's development of the best available science shall be independent and developed from a review of science on all factors that affect the complex habitat systems that comprise the Delta environment.

b. Timelines

The Plan should include a timeline, perhaps broken down into near-term and long-term objectives, illustrating all action items. A schedule for each action item will provide structure and set expectations for action.

c. Inclusion of Independent Scientists and Consultants

The scientific community studying the Delta extends beyond state agencies and academic institutions. Members of the science community who are not affiliated with any particular agency or

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institution should be included on decision-making and research development teams such as the Policy-Science Team ("PST") and Science-Synthesis Team ("SST") (action items 2.1 and 2.2, respectively). The Plan identifies these teams will be staffed by "science leaders," but the Plan does not further identify who will be designated as a "science leader." It is important that these "science leaders" represent the various perspectives within the entire scientific community, including the perspectives of water users and water operators. Including a wide range of expertise and independent interests will strengthen the Plan's vision of One Science, One Delta.

d. Process to Reach Scientific Consensus

The Plan is highly focused on synthesizing information and research efforts across the Delta, presumably to establish "One Delta, One Science." Understandably, this arises from what has been phrased as "combat science," or conflicting conclusions from scientific research, models and reports regarding the Delta. The Plan should outline the process the science-based teams will implement to evaluate science. For example, there should be a process to evaluate conflicting science. If certain science is determined to be less credible than other science, the process should explain the reasons for this determination. Similarly, the Plan should include what, if any, consensus exists regarding the state of science in the Delta. This may help provide a foundation from which the Program can begin the implementation of the Plan.

e. Team Structure and Descriptions

The Plan's first three action items (action items 2.1 – 2.3) establish three separate teams. The Plan should more clearly explain the need for three separate teams. As currently drafted, the separate teams appear to share similar duties and purposes, making the individual nature of each team commingled and unclear. For example, the PST is supposed to identify "grand challenges" and the SST is tasked with translating the "grand challenges" into specific research priorities and questions. It is unclear why two separate teams are necessary for these two tasks. In addition, the Plan allows members to be part of both the SST and PST teams, which creates additional overlap.

Further overlap occurs between the SST and the Focused Synthesis Team ("FST") because each shares the duty to synthesize current knowledge and research. (*See, e.g.*, Delta Science Plan, at 13 ["[The Science Synthesis Team will] synthesize relevant research and current knowledge…"] and 14 ["The Focused Science Synthesis Teams] will synthesize the state of knowledge of specific topics…"].) The purposes of these teams should be separate and more clearly communicated.

f. Allocation of Responsibility

The Plan should more clearly identify the responsible party for each of its proposed action items. Currently, the Plan sets forth general actions without allocation of responsibility. For example, items 2.4 – 2.7 state actions, including: "Identify opportunities and mechanisms…;" "Hold legislative briefings;" "Link interagency and coordinated science efforts…" It is unclear who or what entity will undertake those actions. (Delta Science Plan, at 14.) The Plan should make clear which party is responsible for taking each of the specific actions identified in the Plan.

Thank you for the opportunity to comment; the SJTA looks forward to future collaboration for the development of the Science Plan.

Very truly yours,
O'LAUGHLIN & PARIS LLP

AUDREY K. PATTERSON

AKP/tlb

cc: San Joaquin Tributaries Authority