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To:	Delta Council Science
Cc:	Harader, Sam@DeltaCouncil; Goodwin, Peter@DeltaCouncil
Subject:	State Water Board comments on the first Draft Delta Science Plan
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State Water Resources Control Board (State Water Board) staff appreciates the collaborative efforts of the Delta Science Program (DSP) to develop the Delta Science Plan (Draft Plan) to achieve the goal of "One Delta, Once Science." The goal of "One Delta, One Science" and a plan for achieving that goal is critical to achieving the State's coequal goals of water supply reliability and protecting, restoring and enhancing the Delta ecosystem, as well as the State Water Board's responsibilities to preserve, enhance and restore the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations. As such, State Water Board staff appreciates the opportunity to provide feedback on the Draft Plan and to work with the DSP to refine the plan and implement it. Following are staff's preliminary comments on the first draft.

General:

The Draft Plan identifies the key issues that will need to be addressed to achieve the goal of "One Delta, One Science" and provides a process for addressing those issues. However, it is still unclear how the plan will ensure that those processes are consistently implemented effectively. The plan seems to rely largely on voluntary participation by a broad group of organizations with disparate objectives. To be effective, the plan will require a clear governance structure to ensure adequate and effective participation by other organizations and a process for reaching resolution on contested issues. In addition to governance, the plan will need consistent long-term sources of funding for both the DSP activities and other contributory organizations. The draft plan identifies significant additional work for other organizations that will require additional resources or redirected resources. At the minimum, a commitment from the key participatory organizations to participate and align with a specified process will be needed. In order for organizations to agree to such a process, additional detail will be needed concerning the governance structure and how the plan integrates with existing efforts and the mandates of other organizations. State Water Board staff is happy to discuss these issues in more detail with you and your staff.

Specific Comments:

- **Page iii, Audience and Uses of the Plan:** The bulleted items in the Delta policy makers category should also indicate how the policy maker would use information. For example, as a Delta policy maker, the State Water Board would use synthesis reports prepared by the Delta Science Program to highlight important science considerations during the development of proposed modifications to water quality objectives in the Bay-Delta Plan.

- **Executive Summary, page 2, line 5-8:** The Draft Plan indicates that the focus of the Delta Science Plan will be the legal Delta and Suisun Marsh. While the Draft Plan indicates that the plan may address "larger-scale processes, functions, and stressors outside its primary geographic focus area that influence

conditions within the Delta," it is not clear if the plan will also address species issues and inflow issues that extend beyond the Delta into the Delta Watershed and how the plan will be integrated with other efforts in the Sacramento and San Joaquin Watersheds. Staff recommends that the draft language clarify that the plan will encompass issues outside of the legal Delta as needed to address specific priority science needs in coordination with any related existing local watershed efforts.

- **Executive Summary, page 2, line 6:** Initial use of an incorrect code citation is used here. Section 12220 is from the California Water Code, not the Public Resources Code. This should also be changed throughout the remainder of the document.

- **Section 1, The Science Action Agenda (Action Agenda), page 6-7:** Staff recommends that the Science Action Agenda (Action Agenda), which will prioritize near-term actions and research to achieve the objectives of the Delta Science Plan, have a clearly identified prioritization process. State Water Board staff acknowledges that the Action Agenda will be developed through an open process by the Delta science community and the Science Synthesis Team, under the leadership of the Delta Science Program. However, there is no clear process on how disputes over science prioritization shall be resolved. Additionally, once science priorities are properly identified, what is the process for identifying who or what agency is responsible for funding those science priorities. Staff recommends that this be clearly articulated in the Delta Science Plan.

- **Section 1, The State of Bay-Delta Science (SBDS), page 7:** The State of Bay-Delta Science (SBDS), which will contain a synthesized summary of current knowledge from all sources, is scheduled to be written every four years. Policy makers and decision makers may have a need to know what new science has been developed on a more frequent basis. In addition to preparing the SBDS on a four-year cycle, staff recommends that the Delta Science Strategy plan to annually provide a summary report of ongoing Delta research (similar to and in coordination with the Interagency Ecological Program's (IEP) annual workshops), the current status of ongoing programs, and inform the public of new programs developed during the previous year.

- **Section 2, Efforts to Build On, page 11:** An incorrect reference is made here. The 2012 Delta Science Program coordinated invited Science Expert Panels to synthesize the state of knowledge for the State Water Board members for the Bay-Delta Plan Phase 2 Update, not Phase 1.

Section 2, Organizing Science to Inform Policy Management: Aspects of the actions described in Section 2 appear to be comparable to the work already being conducted by the IEP, or proposed by the Bay Delta Conservation Plan (BDCP). Clarification would be helpful to explain how the Delta Science Plan, the Policy-Science Team, Science Synthesis Team, and the Focused Science Synthesis Teams will be integrated with IEP and BDCP efforts, how these teams will support or replace IEP and BDCP efforts, and who will have control over work products.

- **Section 3, Adaptive Management for a Complex System:** Actions described in Section 2 of the Delta Science Plan; establishment of the Policy Science Team, Science Synthesis Team, and the creation of Focused Science Synthesis Teams, are not carried on into Section 3, Adaptive Management for a Complex System. The establishment and creation of these teams and subsequent involvement in the Adaptive Management process seems likely. Staff recommends that such information be provided.

- **Section 4, Building the Infrastructure for Cutting-Edge Science:** Staff recommends that the Delta Science Plan include provisions to articulate the current efforts (data storage and data synthesis) that appear duplicative, and suggest mechanisms for coordination of efforts to minimize continued fragmentation of the science or mechanisms for synthesizing science.

- **Section 4.4, Shared Modeling:** Staff recommends that the Delta Science Plan include provisions to coordinate various related modeling efforts to create a unified database to be used for modeling purposes. This section could encourage mechanisms that involve collaboration between scientists and modelers as ways to improve comparative analysis tools.

- **Section 4.6, Independent Scientific Peer Review and Advice:** The Delta Science Plan should identify a clear and sustainable source of funding to ensure that it will be able to respond to requesting agency needs for peer review and advice.

- **Section 4.7 Communication:** Staff recommends that provisions be added to the Draft Plan to revise the Delta Science Program website to provide easy visual access to existing science communications.

    - Action 4.7.1: Expansion of science communication is a valuable action. In addition to outreach to the State Legislature, outreach to policy-making agencies and their staff should also be enhanced.

- **Page A2-1, Appendix 2: Funding Delta Science:** A solid funding source is integral in the success of the Delta Science Plan. Staff understands that this Appendix needs an in-depth discussion regarding funding Delta Science, and looks forward to reviewing and commenting when future Drafts of the Delta Science Plan are released.

We understand that there will be a Second Draft and Final Delta Science Plan in August 2013 and a Final Delta Science Plan in September 2013. Staff looks forward to continuing to work with the DSP on these drafts.

Sincerely,

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