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From: Culberson, Steve@DeltaCouncil <Steve.Culberson@deltacouncil.ca.gov>

Sent: Thursday, June 13, 2024 11:10 AM

To: Delta Council ISB <DeltaCouncilISB@deltacouncil.ca.gov>

Cc: Yu, Edmund@DeltaCouncil <Edmund.Yu@deltacouncil.ca.gov>; DeBey, Henry@DeltaCouncil <Henry.DeBey@deltacouncil.ca.gov>

Subject: Comments on "Exploring scientific and management implications of upper trophic level food webs in the Delta"

Please find herein some brief comments upon reading the above referenced-report. I would be happy to follow-up on these comments in any way the Board might feel helpful.

Thank you for your service to Bay-Delta science.

Regards,

Steve

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1. An underappreciation of the amount and extent of food web work extant in the Delta/Estuary may stem from a lack of high-profile and so-named "food web" research or explicit synthesis (POD and related investigations notwithstanding). The examples chosen by the ISB to highlight were in some ways exceptional, and do not adequately reflect the scale or scope of activity and understanding regarding our food web-based analysis. This is also partly because we have not normally, as the ISB suggests we should, organized ourselves explicitly to a food web-based approach for data collection, analysis, and synthesis, at least as a community that works on the Bay-Delta.
 2. The ISB sets as a need the availability and synthesis of existing data, and comments that there is at least a perception of lots of data that goes unknown or un-synthesized. If we try to understand the cause of this gap or oversight it will invariably come down to a lack of commitment by the agencies who fund this work to prioritize this synthesis over the piece-meal and highly-specific (yet eminently "scope-able" and "contract-able") work that is usually what suffices for regulatory needs. Until there is commitment (and understanding why the commitment is needed) at the highest levels for this work at the USBR, DWR, DFW, USFWS, and State Water Board, scientific desire for this outcome will remain unheeded.
 3. Organizing a food web-oriented or model-based approach to acquiring and managing data is an important recommendation from the ISB. We receive such recommendations each time a similar review is published. Unfortunately, there is no single entity or authority that is set up or responsible to receive such a recommendation, particularly in an accepted, shared-governance context. The recommendations then therefore remain for individual program managers and researchers to pursue individually or within agencies, but the required "universal lift" including

all agencies working together is not apparent or discovered, and implementation remains diffuse and uncoordinated, leading again to the shortcomings that the ISB found in this regard.

4. As ever, implementation will be spotty or non-existent until proper resources and governance of interagency cooperation can be identified.



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