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**To:** Delta Council ISB <[disb@deltacouncil.ca.gov](mailto:disb@deltacouncil.ca.gov)>

## **Subject: Draft Prospectus on the Contaminants Monitoring Review Comments**

Delta Independent Science Board (DISB) Members,

Thank you for the opportunity to comment on the Draft Prospectus on the Contaminants Monitoring Review (Review). We greatly appreciate its focus on chemical contaminants and toxicity monitoring in Delta surface waters, sediments, and wastewater treatment effluents. The scope and goals of the Review as outlined in the prospectus will provide critical information for the Delta Plan Performance Measures (PMs). The Delta Stewardship Council (Council) is initiating refinements and revisions to the Delta Plan PMs based on findings and recommendations in the 2024 Delta Plan Five-Year Review.

The Delta Plan is a comprehensive, long-term management plan for the Delta. Required by the 2009 Delta Reform Act, it creates rules and recommendations to further the state's coequal goals for the Delta: Improve statewide water supply reliability, and protect and restore a healthy Delta ecosystem, all in a manner that preserves, protects and enhances the unique agricultural, cultural, and recreational characteristics of the Delta.

The Water Quality (WQ) chapter of the Delta Plan discusses the trade-offs and conflicts inherent in managing water quality for multiple objectives. It recommends strategies to make balanced improvements, primarily by prioritizing projects and programs. The PMs within the WQ chapter mainly rely on already existing programs, standards, and monitoring stations in the Delta for tracking progress in meeting the state's coequal goals.

However, since the adoption of the WQ PMs in 2018, best available science, monitoring programs, and other technologies have greatly improved, creating opportunities to update the PMs. During the recently completed [Delta Plan Five-Year Review](#), Council staff identified some of these opportunities. We are now conducting revisions to the PMs including addressing these issues:

1. **Measurable Toxicity (PM 6.9)** - This PM is based on sediment toxicity using macroinvertebrates testing, with a target of <1% of macroinvertebrates exceeding toxicity thresholds. The current target may be overly aspirational and within the range of potential false positives. The metric is vague about the definition of "toxicity" it measures (e.g., Chronic and Acute, types of analytes) and reference data are inconsistent. Newer data sources defining toxicity success and leveraging

Delta Regional Monitoring Program (Delta RMP) annual toxicity sampling will be central to the refinement of this PM.

2. **Critical Pesticides (PM 6.7)** - This PM is based on the reduction in the number of “critical” pesticides within the Delta using the State’s 303(d) list / impaired waterbodies list. The PM tracks a subset of impaired waterbodies and does not sufficiently represent the current status and changing trends of key pesticides in the Delta. Council staff continues to review possible revisions of metrics, baselines, and targets for this PM using available data sources such as the California Department of Pesticide Regulation Surface Water Database.
3. **Delta Water Quality (PM 6.1)** - This PM is based on waterbody-contaminant combinations and the status of water quality protection (Total Maximum Daily Loads (TMDL) or other programs) within the Delta using the state’s 303(d) list. Council staff initiated a review of the PM considering recommendations from the Delta Lead Scientist and interested parties. The PM is limited in tracking water quality improvements and displaying reaches removed from the list. Council staff continue to review possible revisions of metrics and targets for this PM and new data analysis and visualization methods to better communicate the results.

The DISB’s Review will provide Council staff with critical information to assist with refining the performance measures identified here. Additionally, the Review can inform development of new PMs including metrics and targets for emerging contaminants, water pollution from microplastics, water quality impacts from wildfires, and multiple stressor interactions. The DISB Review will be important for addressing these identified issues and informing the upcoming PM revisions.

Along with the described ongoing work on PM revisions, there is also potential for a future Delta Plan Amendment updating related policies and recommendations. The Review will be helpful in synthesizing publicly available data sources and available scientific literature to identify possible gaps in current contaminants monitoring programs and make recommendations applicable to Delta decision making.

Thank you. I look forward to learning more about your work.

Best regards,



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