



California Water Quality Monitoring Council



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COMMENTS ON PROPOSED FINAL DRAFT DELTA SCIENCE PLAN

The California Water Quality Monitoring Council appreciates your careful consideration of comments submitted for the second draft of the Delta Science Plan. As we described previously, there is considerable overlap between the Delta Science Plan and the Monitoring Council's recommended [Comprehensive Monitoring Program Strategy for California](#) (Comprehensive Strategy). While previous drafts have acknowledged our contributions and suggested modifications, we noticed that the latest draft of the Delta Science Plan did not reflect a number of our suggested recommendations. Therefore, we would like to re-iterate the following specific comments on the proposed final draft of the Delta Science Plan.

Do we have the right data?

We recommend that the Plan add a data acquisition element that provides a review process to ensure that appropriate and adequate data are being obtained. Without such an element, the data and its synthesis will likely continuously be viewed as inadequate to make the science decisions necessary to meet the coequal goals. The data acquisition process should have the same ongoing, iterative review that the Plan envisions for modeling and synthesis.

Building on the efforts of the Monitoring Council and its workgroups

In this proposed final draft of the Delta Science Plan, there is more-frequent mention of the Monitoring Council, but mainly in the "Efforts to Build On" boxes. It would be more informative and useful for the Plan to further highlight the existing work of the Monitoring Council and its workgroups in other areas of the Plan. For example, since there is such a clear nexus between the existing work of the Monitoring Council's Estuary Monitoring and Wetland Monitoring workgroups –coordinating monitoring, developing standard methods and QA, bringing data together from disparate sources, building data visualization tools, and reporting data and assessment information through a web portal – and

comparable aspects of the Delta Science Plan, it would help to expand discussion of these efforts, either in an appendix to the Plan or in the Science Action Agenda document. For example, on page 8 it is mentioned how scientific efforts in the Delta are being performed by multiple entities without an “overarching plan for coordinating data management and information sharing.” Mentioning the efforts of the Monitoring Council in the “Efforts to Build On” box would be a good start; however, specifically highlighting the work of the Wetland Monitoring and Estuary Monitoring workgroups would emphasize those existing efforts, as well as the potential issues that need to be addressed (e.g., funding and resources). There are multiple key points of the document which relate to the existing work of the Monitoring Council, and it seems worth explaining the potential connections.

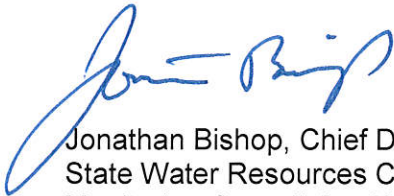
Section-by-section recommendations:

- *Page 8, Section 1. Introduction, “Efforts to Build On” box* – Add [Comprehensive Monitoring Program Strategy for California](#) by the California Water Quality Monitoring Council and briefly highlight the relevant efforts of the Monitoring Council’s workgroups – Wetland Monitoring Workgroup, Estuary Monitoring Workgroup, Healthy Streams Partnership, Bioaccumulation Oversight Group.
- *Page 15, Update and Communicate the State of Science and Delta Science Plan Performance, Action* – Add web-based communication of available science through collaborative internet portals, such as that being developed by the Estuary Monitoring Workgroup of the California Water Quality Monitoring Council. This mechanism allows for continuous access, visualization, and regular updating of data and assessment information.
- *Page 29, Section 4.1, Funding Research* – This appears to focus mainly on funding new research. However, part of increasing the state of scientific knowledge also involves bringing together existing research and monitoring data (e.g., in web portals), so that researchers and managers are aware of what work has and continues to be performed in the region. Having these data and information readily available is crucial for researchers and managers to design innovative studies which build upon existing information. More emphasis on this and the related work of the Monitoring Council would again be helpful.
- *Page 30, Section 4.2 Monitoring and Associated Research, “Efforts to Build On” box* – Add the following two items under Monitoring strategies:
 - 1) [Comprehensive Monitoring and Assessment Strategy to Protect and Restore California’s Water Quality](#) developed by the Surface Water Ambient Monitoring Program (SWAMP)
 - 2) [Tenets of a State Wetland and Riparian Area Monitoring Program](#) developed by the California Wetland Monitoring Workgroup of the Monitoring Council
- *Page 31, Action 4.2.1 Support and sustain a web-based information system for monitoring activities, Primary Responsibility* – Add “and its workgroups, especially the California Estuary Monitoring Workgroup, the California Wetland Monitoring Workgroup, the Healthy Streams Partnership, and the Bioaccumulation Oversight Group.”
- *Page 33, Action 4.3.2 Develop Guidelines for Data Sharing, Primary Responsibility* – To “California Water Quality Monitoring Council” add “and its Data Management Workgroup.”
- *Page 35, “Efforts to Build On” box* – Confirm that the My Water Quality web address is <http://www.MyWaterQuality.ca.gov>.
- *Page 45, Box 5-1 Building Capacity* – The first two bulleted items, “ability to recruit and retain the next generation of scientists” and “career tracks for scientists in government,” are critical items that need to be addressed for the Plan to be effective. Specific “Actions” are needed to address these goals, such as:

- Support existing efforts of the California Department of Human Resources (CalHR) to consolidate and update scientific classifications within state service (e.g., Environmental Scientist and Research Scientist class series) so as to more accurately reflect scientists' work and to increase both opportunities for upward mobility without supervising and movement of scientists within and between departments and programs.
- *Page 45, bulleted item "Increase the ability to recruit, retain, and equitably remunerate scientists" and Page 47, fourth Objective "Reform the underlying capacity challenges to conduct science for ecosystem and water management, such as the ability to recruit and retain scientists into State service, as well as providing them with the essential tools required to fulfill their duties"* – As stated above with respect to Box 5-1 on page 45, the Plan needs specific "Actions" to implement these objectives. Without specific actions, these objectives are not likely to be realized, impairing the effectiveness of the Delta Science Plan.

For questions regarding the above comments, please contact Monitoring Council Coordinators Jon Marshack at jon.marsahck@waterboards.ca.gov, (916) 341-5514 or Kris Jones at kristopher.jones@water.ca.gov, (916) 376-9756.

Sincerely,



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cc: Members of the California Water Quality Monitoring Council