



California Water Quality Monitoring Council



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**RE: CASA COMMENTS ON CALIFORNIA WATER QUALITY MONITORING
COUNCIL STRATEGY – “TOP FIVE AREAS WHERE THE COUNCIL ADDS
VALUE FOR THE STATE OF CALIFORNIA”**

Dear Mr. Link,

On behalf of the California Water Quality Monitoring Council (Council), please accept the following responses to the comments submitted by the California Association of Sanitation Agencies (CASA) via a [letter dated July 26, 2018](#). The document titled “Top Five Areas Where the California Water Quality Monitoring Council has Expertise and can Add Value to the State” (hereafter Top 5) is intended to provide a framework for refocusing the Monitoring Council’s strategy to realign with the founding legislation ([SB 1070, Kehoe 2006](#)). The document identifies where the Council can and does add value to the state, working with and enhancing the Council’s current organizational structure. . To better provide that value, the document also identifies the need to shift the charge of the Council and its workgroups away from providing access to data via portals toward data comparability; identifying monitoring program efficiencies and emerging issues; and establishing a plan for wider communication and engagement.

CASA Comments on Area #2: “The existing “bottom up” structure, where the workgroups are the primary drivers on data quality standards and method standardization, is much more appropriate than the new “top down” proposal articulated within the Areas of Expertise document. The original “bottom up” structure has the capability to provide for greater stakeholder participation. As membership on the Council is restricted, maintaining the existing structure allows for a much greater stakeholder involvement process that results in greater agreement, acceptance, and success of each project. Therefore, CASA recommends that the Council maintain its role in providing high-level direction and continue to allow the technical details to be developed at the workgroup level and through SWAMP, and we hope that this approach will be reflected in the Council’s new Comprehensive Strategy.”

Response: The intent of this strategic area is to refocus the Council's efforts towards providing guidance to its workgroups regarding the founding principles of SB 1070 related to monitoring coordination and efficiency. To adequately coordinate and identify efficiencies, the workgroups must refocus their efforts towards method consistency and data comparability across monitoring programs. The development of specific guidelines would remain the responsibility of the workgroups with the Council having an oversight role providing insight and feedback as necessary.

CASA Comment on Area #3: "Because of the potential impacts associated with threshold setting, CASA supports use of an inclusive stakeholder process to evaluate and potentially develop numeric thresholds. The Council is not the appropriate venue for development of thresholds which could then be implemented in other policies and programs at the State Water Board and other state agencies."

Response: The intent of this strategic area is to illustrate that the Council should focus on identifying water quality and ecological health parameters that lack thresholds for measuring beneficial use support. The Council would utilize the workgroups and coordination across agencies and sectors to recommend thresholds that stakeholders could use to interpret data that would otherwise be unusable. Because the Council and its workgroup meetings are open to the public, the development of recommendations would be done transparently and involve feedback from all participating stakeholders. Once developed the Council can provide those recommendations to the Agency Secretaries who can implement those recommendations through their departments, boards, commissions, and conservancies and applicable with state and federal law including those for public participation. The Council does not have the authority to set standards.

CASA Comments on Area #4: "...it appears the Council's new Comprehensive Strategy could direct the Council to identify new methods and make recommendations on standardizing the methods. The description of Area #4 explicitly refers to methods standardization, especially for new and emerging pollutants and methods...Prior to making a fundamental shift towards standardization, the Council would need to perform an analysis that the current approach is not working. Such an analysis should be performed at the individual workgroup level, not at the level of the Council itself. CASA recommends that, rather than making recommendations for method standardization, the Council first facilitate coordination of methods, which may include holding inclusive stakeholder meetings to evaluate the methods being used."

Response: The intent of this strategic area is to state the Council's role in identifying emerging issues and technological advancements in monitoring methods. When new methods are identified, the Council will determine the need for workgroups to facilitate coordination efforts before agencies or programs become wed to specific method utilization. This early engagement in developing new methods allows for early discussions about data comparability to ensure that monitoring programs are developed and coordinated in a way to efficiently address current and future management questions. While method standardization would facilitate data comparability and allow for greater opportunities for leveraging resources across agencies, the Council realizes that certain methods will perform better under specific conditions and are subject to many logistical variables. These discussions would occur at the workgroup level and the Council will provide expertise and guidance as necessary.

The Top 5 document as a whole is intended to be a starting point to a larger more comprehensive update to the Council's strategy that will be provided in an open and transparent

forum. We appreciate the feedback from the California Association of Sanitation Agencies, an active partner with representation on the Council, and look forward to continued collaboration on updating the Council's overall strategy. The next Council meeting is scheduled for Wednesday, September 5, 2018.

Please feel free to contact us or Nick Martorano, Council Director with any questions you may have or to discuss this further.

Sincerely,



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Division of Water Quality
State Water Resources Control Board
Monitoring Council Co-Chair
Representing CalEPA



Taryn Ravazzini, Deputy Director
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cc: Members of the California Water Quality Monitoring Council