

**DELTA PROTECTION COMMISSION**

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November 15, 2021

Delta Independent Science Board  
c/o Delta Stewardship Council  
Jessica Moffat, Sea Grant Fellow  
715 P St., 15-300  
Sacramento, CA 95814

**Sent via email:** [disb@deltacouncil.ca.gov](mailto:disb@deltacouncil.ca.gov)

**Re: “Review of the Monitoring Enterprise in the Sacramento-San Joaquin Delta”**

Dear Chair Brandt and Board Members:

I appreciate the opportunity to submit comments on behalf of the Delta Protection Commission (Commission) for the Delta Independent Science Board’s Monitoring Enterprise Review (MER).

State law declares that the coequal goals for the Delta are to be achieved in a “manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place” (Public Resources Code (PRC) section 29702). The law also recognizes the Commission as “the appropriate agency to identify and provide recommendations to the Delta Stewardship Council on methods of preserving the Delta as an evolving place” as the Council implements the Delta Plan (PRC section 29703.5). In addition, the Commission has authority to review and provide comments and recommendations to the Council on “any significant project or proposed project within the scope of the Delta Plan...that may affect the unique cultural, recreational, and agricultural values within the primary and secondary zones” (PRC section 29773).

While we understand the scope of the Monitoring Enterprise Resource review (MER) Phase I is complete, we still advocate for “Delta as Place” values to be part of the monitoring enterprise and suggest several opportunities for research and monitoring. While the Commission does not conduct frequent monitoring nor has funding to contract for it, our recent updates of the Economic Sustainability Plan for the Delta chapters on agriculture and recreation/tourism include data sets that should be considered when creating programmatic monitoring opportunities.

In the recent Delta Independent Science Board review, Board members synthesized the common management themes and actions from planning efforts spanning 2013 to 2017 (see page 24). The Commission notes that the only “Delta as Evolving Place” actions in this list are “flood management” and “land use management.” However, the Commission has emphasized during the MER review that the cultural and tribal elements of the Delta have been understudied (at best) and ignored (at worst). We suggest that this list of themes and actions be expanded to include a review of “Cultural Asset Management (Delta as Evolving Place).” This proposed action has been elevated in status with the designation of the Sacramento-San Joaquin Delta National Heritage Area (Delta NHA) by Congress in early 2019.

We support efforts to make data accessible to the public, decision makers, other scientists, and stakeholders. One of the founding principles for the Delta NHA management plan is to ensure the cultural assets are shared with partners and decision makers (though shielding sensitive and non-disclosed data) so the Commission can support long-term protection and enhancement of critical assets. Commission staff endeavor to have an inventory where the data are correct and reliable, and welcome the opportunity to provide critical information needed for management decisions in the Delta. We appreciated the ISB’s summary of best monitoring practices on pages 58 to 66 as we begin our own inventory work under the advice of our Commission, Task Force, and Advisory Committee members.

The “Monitoring Needs Profiles” for each of the seven management themes relevant to the Delta were developed to understand potential gaps or redundancies based on the inventory analysis. With the inclusion of a new “eighth” theme, we suggest some preliminary review of cultural assets be included in this section of the report. Even an admittance of the significant gap in current understanding of these assets could help with securing necessary funding for more studies.

Later in the document, the Delta ISB identified monitoring gaps in chemical contaminants, harmful algal blooms, non-native species/invasive species, and dredging (see pages 35-38). The Commission is supportive of future actions taken to reduce these monitoring gaps as they directly impact the people who live, work, and recreate in the Delta.

We also agree with the assessment that there is a gap in the monitoring of “recreation and tourism” (page 39). The Commission updated recreation and tourism data for the Economic Sustainability Plan update in 2020. However, we still see a large gap in our knowledge of recreation use in the Delta. In addition, the ISB notes “According to the monitoring activity inventory compiled for Component 1 of this review, most monitoring activities of relevance to the Delta occurs at the state scale (31%), followed by the Delta regional (29%), local (19%), and national scales (18%)” (page 77). The known lumping of recreation and tourism data to the national, state, and local scale has been identified in many related reports and has hindered decision making. Regional or local data to illuminate baselines or trends in recreation and tourism are rare. The Delta only covers portions of five counties, so even lumping data into County scale can negate true trends analysis. Overly broad assumptions and comparing “apples to oranges” has made it difficult to quantify recreation and tourism impacts when evaluating major construction projects such as the isolated conveyance proposals.

Thank you for your support of social science monitoring for the Delta region.

Sincerely,

A handwritten signature in blue ink, appearing to read "E. Vink". The signature is fluid and cursive, with the first letter of each name being capitalized and prominent.

Erik Vink  
Executive Director

cc: Chair Don Nottoli and members, Delta Protection Commission