



July 26, 2019

Submitted via disb@deltacouncil.ca.gov

Delta Independent Science Board
c/o Delta Stewardship Council
980 Ninth Street, Suite 1500
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On behalf of the State Water Contractors, I would like to thank the Delta Independent Science Board (Delta ISB) for conducting this important review and the opportunity to comment on the draft review of the Interagency Ecological Program (IEP), “A Review of the Interagency Ecological Program’s Ability to Provide Science Supporting Management of the Delta.”

Overall, we found that this review provides a thoughtful evaluation of a complex program, and we agree with many of the conclusions and recommendations in the review. Before providing our specific comments, I would like to note that the next step would be to consider implementation of the recommendations. Although this can be a difficult task, the Delta Stewardship Council may already be providing a path forward through the Delta Science Funding Initiative. Four collaborative Delta Science Funding and Governance Sub-groups have been tasked with implementing recommendations in the Delta Science Funding Initiative white paper, and are having ongoing discussions on funding, governance, and long-range science planning. Implementation of recommendations from the Delta ISB reviews of IEP and the Monitoring Enterprise should be integrated with the recommendations coming out of the Delta Science Funding and Governance Sub-groups: the efforts are not only related, but they inform each other. A set of integrated recommendations that tie into management questions for the system should be considered for approval by the Delta Plan Interagency Implementation Committee.

I would also like to note that implementation of IEP affects a broader community than the IEP member agencies. Stakeholders, including the Public Water Agencies (PWAs), can provide input that would be helpful for implementing recommendations in a way that addresses organization, efficiency, funding, and transparency.

Our specific comments are below:

- We understand that development of questionnaires (Section IV.a) is an artform that requires specific expertise. It would be helpful to understand if a social scientist was involved in developing the questionnaire. If so, the methods should state so. Additionally, the methods section should address how the Delta ISB accounted for bias in responses.

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- We agree with the Delta ISB recommendation that IEP needs to take extra safeguards to ensure that decisions are made in an open and transparent way. We appreciate the efforts of IEP in recent years to form the IEP Stakeholder group, provide updates on IEP workplan activities and involve interested stakeholders in planning the IEP Annual Workshop. We do agree that more should be done to increase transparency and involvement of stakeholders. As an initial step, IEP should aim for providing increased transparency on workplan activities by providing information on the drivers or needs for the projects and the sources of funding for the projects. We would encourage IEP to continue to bring ideas and proposals to stakeholders for input earlier in the decision-making process to provide technical input and guidance.
- Recommendation 4, which ties into the discussion in Appendix A (Description of Selected Interagency Research Programs), indicates that IEP consider alternative organizational structures that better enhance collaboration and commitment with its partners and stakeholders. It would be helpful for the Delta ISB to identify which structure or combination would be most helpful to address Recommendation 4.
- Recommendation 5 directs IEP to take extra safeguards to ensure that decisions are made in an open and transparent way. It would be helpful for the review to identify any recommended safeguards.
- While Recommendations 6, 8 and 10 (p. 3-4) are introduced from different background points, the recommendations all get at a single action of prioritizing data collection and analyses, for both monitoring and experiments, based on what is most useful or needed for Delta management, consistent with available short- and long-term funding and staff resources. Therefore, combining them into a single recommendation seems most appropriate.
- Recommendation 9 should explicitly reference the broader science community (e.g., PWAs), not solely agency scientists, in the assessment of new methods.
- In Recommendation 10, the Delta ISB notes that additional emphasis and resources should be placed on experimentation and synthesis to assist and guide management in the Delta. We don't disagree with this recommendation; however, the source of the funding for these efforts would need to be considered. The review should note that the DWR and USBR funding for the large portion of the IEP activities is from the state and federal water contractors, since many of the workplan elements are compliance requirements for the SWP and CVP. Resources for experimentation and synthesis should come from other broader sources of funding.
- On page 11 of the review (lines 31-38) there is a discussion on the usefulness and overlap of long-term data sets. This section would benefit from a discussion about long-term funding to address this issue. Long-term funding should also be a key criterion when considering whether to continue, consolidate, etc. the data collections.

July 26, 2019

Page 3

- On page 16 of the review (line 13), there is a statement that much of the IEP Lead Scientist's time seems to be spent defending IEP and its activities. This is a provocative statement that should be explained more fully.
- On page 17 of the review (line 8), the Delta ISB states that they found a general feeling of pessimism about the future of IEP and concern for the lack of base funding for IEP. We presume these comments were expressed through survey responses and/or interviews. We do not think it is accurate to convey that there is a lack of base funding for IEP. A majority of the IEP workplan activities are compliance related monitoring and surveys that are required and are funded by the SWP and CVP contractors (see comment on Recommendation 10 above).
- We agree with the Delta ISB recommendations on page 17 (Section h. Coordination and Prioritization) for better coordination of IEP with other agencies and programs to improve efficiency, and to continually assess the use of new methods and technologies.

Thank you again for the opportunity to provide comments on the draft review of IEP. If you have any questions, please don't hesitate to contact me. We look forward to your discussion of this review at a future Delta ISB meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Pierre". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Jennifer Pierre
General Manager