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**Sent:** Wednesday, May 31, 2023 4:49 PM

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

**Subject: Comments on ISB Prospectus for Managing subsidence in the Sacramento-San Joaquin Delta**

Dear Members of the Delta Independent Science Board,

Thank you for the opportunity to review and provide comments on the your prospectus for Managing subsidence in the Sacramento-San Joaquin Delta. I am providing brief comments here and happy to discuss in further detail if requested.

**First, an overall comment:** The topic of subsidence is a long-standing and difficult issue in the Delta and it is commendable and appropriate for the ISB to tackle this issue. However, as noted in the prospectus, the 2023 edition of the State of Bay-Delta Science contains a thorough review of both carbon sequestration and subsidence reversal in the Delta (Windham-Meyers, et al. 2023). My expectation is that the ISB review will be distinct from the SBDS article particularly with respect to plans for economic evaluations of subsidence mitigation alternatives; however, this is not clear in the prospectus itself. For clarity between two different efforts on the same topic supported by the same organization, it would be helpful for the final prospectus to explain how the ISB effort will be distinct from the published SBDS review.

**Second, a comment on the scope:** The prospectus summarizes plans to evaluate economic costs and benefits of managed soil re-wetting for farm productivity, levee stability, water quality, among other things. It would also be helpful to assess the water supply costs (in amount of water) for managed soil re-wetting, and compare that with other subsidence reversal strategies. What are the tradeoffs between strategies from a water supply perspective? I did not see this already included in the prospectus.

**Third, I would like to note an error in the prospectus:** Page 2, beginning of the second full paragraph: "*In addition to agricultural efforts currently underway to rewet peat soils in the Delta, approximately 25,000 acres of wetland restoration is in progress with 60,000 to 80,000 acres of restoration funded by state programs (Delta Stewardship Council, 2022).*" It is not correct to say the 60,000 – 80,000 acres of restoration are funded. Also, it is not correct to say that there are 25,000 acres of wetland restoration in progress. Under the EcoRestore umbrella, DWR has approximately 28,000 acres in progress or completed but it is not all wetland restoration. A more accurate sentence would read: "...approximately 10,000 acres of wetland restoration is underway or completed, though it is currently estimated that 60,000 – 80,000 acres of habitat needs to be restored to achieve a full restored Delta landscape as described in the Delta Plan (Ch. 4, Protect, Restore, and Enhance the Delta Ecosystem)."

Again, thank you for the opportunity to review. I have also reviewed the DISB prospectus for "Exploring scientific and management implications of upper trophic level interactions in Delta food webs." I believe this will be a valuable review effort and I do not have substantive comments on the prospectus.

Thank you,

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