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Sent: Friday, June 6, 2025 11:40 AM

To: Delta Council ISB <disb@deltacouncil.ca.gov>

Subject: Central Valley Water Board Comments on the Contaminants Review Prospectus

Thank you for the opportunity to comment on the draft prospectus for the Delta Independent Science Board's upcoming review of contaminant monitoring in the Delta.

We encourage that the authors of the review provide as much specificity in the rationale and recommendations for future monitoring as possible. The range of possible environmental contaminants to be monitored is large. The range of combinations of contaminant, matrix, location and season is even larger. Funds and staff resources available through regulatory processes are, on the other hand, limited. Here are examples of content that would be helpful to us for utilizing the results of the review.

Please note that the connection between monitoring and information and management decisions (Goal 2) is not always direct yet may be evidence of adaptive management. For example, monitoring in the Delta and elsewhere influenced the regulatory requirements under which municipal wastewater treatment plants now operate. Nearly all municipal wastewater treatment plants that discharge within the Delta have been required to implement very high levels of treatment to protect beneficial uses. These high standards include tertiary treatment with advanced filtration and nitrification-denitrification. The Central Valley Water Board began requiring high levels of treatment in 2010.

In the review of advanced tools and approaches (Goal 3), please include the most appropriate uses of the tools. For example, new laboratory tests and processing tools at a genetic, cellular or organ level can be used effectively to screen long lists of chemicals and chemical mixtures. These types of tests are appropriately part of a dedicated prioritization or research program to identify and prioritize contaminants of concern. These tests and tools may not be recommended for a routine monitoring and analysis program for environmental samples that relies on continuity and standardized methods..

Precision in the gaps analysis (Goal 4) would also be helpful. A prioritized chemical list with detail of Delta ecosystem component at risk is more readily implemented than more broad characterization of gaps.

We look forward to the results of this review.

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