
State Water Resources Control Board

TO: Ken Landau
Assistant Executive Officer
Central Valley Regional Water Quality Control Board


FROM: Gerald W. Bowes, Ph.D., Manager
Cal/EPA Scientific Peer Review Program
Office of Research, Planning and Performance

DATE: July 3, 2013

**SUBJECT: REVIEWERS APPROVED FOR EXTERNAL PEER REVIEW OF
PROPOSED BASIN PLAN AMENDMENTS TO ADD POLICIES FOR
VARIANCES AND EXCEPTIONS**

I am pleased to respond to your request for scientific peer-reviewers for the subject noted above, The University of California, with whom Cal/EPA has an Interagency Agreement to identify reviewer candidates, recommended scientists it considered qualified to perform the assignment based on carefully conducted interviews.

Each candidate who was both interested and available for the review period was asked to complete a Conflict of Interest Disclosure form and send it to me for review. In follow-up communications with selected candidates, I asked for clarifications as necessary, and affirmation that there is nothing in their background: a) that might be reasonably construed by others as affecting their judgment, and b) which might constitute an actual or potential source of bias. They also were asked to affirm they would be able to perform an objective and independent review.

Reviewers Approved:

- a) John M. Melack, Ph.D.
Professor, Department of Ecology, Evolution, and Marine Biology; and
Bren School of Environmental Science and Management
University of California
Santa Barbara, California 93106

Telephone: (805) 893-7612
Email : melack@bren.ucsb.ca.gov
FAX : (805) 893-7612

- b) Michael K. Stenstrom, Ph.D., P.E.
Professor, Department of Civil and Environmental Engineering
5714 Boelter Hall
University of California
Los Angeles, California 90095-1593
- Telephone: (310) 825-1408
FAX : (310) 206-2222
Email: stenstro@seas.ucla.edu

Curriculum Vitae are attached.

Contacting Reviewers. Contact the reviewers by email immediately. Tell them you have just learned of their identities, and when to expect review material. Keep them informed of delays, and ensure new dates are acceptable. Include me as a “cc” on communications indicating delays.

Initiating the Review. Send the reviewers a cover letter with the following:

- a) original letter of request for reviewers and attachments, which was sent to them by the University during the solicitation process;
- b) Key Document(s) for Review;
- c) Key Supporting Documents.

An example of a cover letter initiating the review is attached. Please send me a copy of the cover letter.

Essential Directions. Tell your reviewers in the cover letter:

- a) **Follow the review guidance provided in the letter of request for reviewers, Attachment 2.**
- b) **Address all topics listed in Attachment 2, as expertise allows, in the order given.**

Revisions. If you have revised any part of the initial request, stamp “Revised” on each page where a change has been made. Clearly describe the revision in the cover letter. Reviewers must be made aware of changes.

Mode of Transmission. Review material frequently is sent electronically. Hard copy is recommended for lengthy documents and documents with fold-out sections. Confirm electronic and hard copies have been received by reviewers.

Confidentiality of the Review Process. Approved reviewers were sent the attached January 7, 2009 Supplement to the Cal/EPA Peer Review Guidelines. Please read it carefully. In part it provides guidance to ensure confidentiality through the peer review process. Reviewers must keep their identities confidential, and I ask that you do also to avoid compromising the external review.

Communication Restrictions. Communications between reviewers and requesting organizations are restricted to questions of clarification. Both enquiries and responses must be in writing.(email is fine). If you prefer, all communications can be routed through me.

Contacts by Outside Parties. After reviews have been submitted, the Supplement notes reviewers are under no obligation to discuss their comments with third parties, and we recommend they do not.

All outside parties are provided opportunities to address a proposed regulatory action through a well-defined rulemaking process. Ask your reviewers to direct third parties to you, or a designated staff person, with comments or suggestions in writing.

Completed Reviews. These are to be sent directly to the person signing the letter initiating the review, unless directed otherwise.

If I can provide additional help, contact me at any time during the review process.

cc: Ms. Betty Yee
Senior Water Resource Control Engineer
Central Valley Regional Water Quality Control Board
<BYess@waterboards.ca.gov>

Mr. Rik Rasmussen
Acting Deputy Director
SWRCB Division of Water Quality
<RRasmussen@waterboards.ca.gov>

Attachments (4)

- 1) Curriculum Vitae – John M. Melack, Ph.D.
- 2) Curriculum Vitae – Michael K. Stenstrom, Ph.D., P.E.
- 3) Example of Letter Initiating Review
- 4) Supplement to Cal/EPA External Scientific Peer Review Guidelines

CURRICULUM VITAE

JOHN M. MELACK

Bren School of Environmental Science and Management, and
Department of Ecology, Evolution and Marine Biology
University of California
Santa Barbara, CA 93106
805-893-3879 (805-893-7612, fax)
melack@bren.ucsb.edu

Education:

| | | | |
|-------|--------------------------------|------|---------------------|
| A.B. | Cornell University, Ithaca, NY | 1969 | Biological Sciences |
| Ph.D. | Duke University, Durham, NC | 1976 | Zoology (Limnology) |

Professional Employment:

| | |
|----------------|---------------------------------------------------------------------|
| 2009 and 2005 | Acting Dean, Bren School of Environmental Science and Management |
| 2006 -2008 | Associate Dean, Bren School of Environmental Science and Management |
| 1987 - present | Professor, University of California, Santa Barbara |
| 1982 - 1987 | Associate Professor, University of California, Santa Barbara |
| 1977 - 1982 | Assistant Professor, University of California, Santa Barbara |
| 1977 | Postdoctoral Fellow, University of Michigan |

Awards:

Fellow, American Geophysical Union
Fellow, American Association for the Advancement of Science
Blaustein Visiting Professor, Stanford University
Gleddon Fellow, University of Western Australia
NSF Energy-related Postdoctoral Fellowship

Editorial Service (current):

Editorial Board, Biogeochemistry (2003 – present)
Editorial Board, Hydrobiologia (1985-present)
Editorial Board, Limnology and Oceanography (2012 –present)

Reviewed publications for last 3 years

2010 Silva, T.S.S., M. Costa and J.M. Melack. Assessment of two biomass estimation methods for aquatic vegetation growing on the Amazon floodplain. *Aquatic Botany* 92: 161-167.

Claessens, L., C. Tague, P. Groffman and J. Melack. Longitudinal and seasonal variation of stream N uptake in an urbanizing watershed: Effect of organic matter, stream size, transient storage and debris dams. *Biogeochemistry* 98: 45-62

Claessens, L., C. Tague, P. Groffman and J. Melack. Longitudinal assessment of the effect of concentration on stream N uptake rates in an urbanizing watershed. *Biogeochemistry* 98: 63-74

- Silva, T.S.F., M.P.F. Costa and J.M. Melack. Spatio-temporal variability of macrophyte cover and productivity in the eastern Amazon floodplain: a remote sensing approach. *Remote Sensing of Environment* 114: 1998-2010.
- Alsdorf, D. S-C Han, P. Bates and J. Melack. Seasonal water storage on the Amazon floodplain measured from satellites. *Remote Sensing of Environment* 114: 2448-2456.
- Li, X, A.E. Miller, T. Meixner, J.P. Schimel, J.M. Melack, and J.O. Sickman. Testing a representation of the rewetting pulse into a soil biogeochemical model. *Geoderma* 159: 440-451.
- Melack, J.M. and L.L. Hess. Remote sensing of the distribution and extent of wetlands in the Amazon basin. Pages 43-59. In W.J. Junk, M. Piedade, F. Wittmann, J. Schöngart and P. Parolin. *Amazonian floodplain forests: Ecophysiology, ecology, biodiversity and sustainable management*. Ecological Studies, Springer.
- 2011 Melack, J.M., A. Finzi, D. Siegel, S. MacIntyre, C. Nelson, A. Aufdenkampe and M. Pace. Improving biogeochemical knowledge through technological innovation. *Frontiers in Ecology and the Environment* 9: 37-43.
- Aufdenkampe, A.K., E Mayorga, P.A. Raymond, J.M. Melack, S.C. Doney, S.R. Alin, R.E. Aalto and K. Yoo. Rivers key to coupling biogeochemical cycles between land, oceans and atmosphere. *Frontiers in Ecology and the Environment* 9: 53-60.
- Belger, L., B. Forsberg and J.M. Melack. Factors influencing carbon dioxide and methane emissions from interfluvial wetlands of the upper Negro River basin, Brazil. *Biogeochemistry* 105: 171-183, DOI: 10.1007/s10533-010-9536-0
- Sadro, S, C.E. Nelson and J.M. Melack. Linking diel patterns in community respiration to bacterioplankton in an oligotrophic high- elevation Sierra Nevada (California, USA) lake. *Limnol. Oceanogr.* 56: 540–550.
- Kemenes, A., B.R. Forsberg and J.M. Melack. CO₂ emissions from a tropical hydroelectric reservoir (Balbina, Brazil). *Journal of Geophysical Research – Biogeosciences* 116, G03004, doi:10.1029/2010JG001465.
- Collins, S.L., S.R. Carpenter, S.M. Swinton, T.L. Gragson, N.B. Grimm, J.M. Grove, S.L. Harlan, A.K. Knapp, G.P. Kofinas, J.J. Magnuson, W.H. McDowell, J.M. Melack, L.A. Ogden, D. Ornstein, G.P. Robertson, M.D. Smith and A.C. Whitmer. An integrated conceptual framework for social-ecological research. *Frontiers in Ecology and the Environment* 9: 351–357, doi:10.1890/100068.
- Sadro, S., J.M. Melack and S. MacIntyre. Depth-integrated estimates of ecosystem metabolism in a high-elevation lake (Emerald Lake, Sierra Nevada, California). *Limnology and Oceanography* 56: 1764–1780
- Rudorff, C.M., J.M. Melack, S. MacIntyre, C.C.F. Barbosa and E.M.L.M. Novo. Seasonal and spatial variability in CO₂ emissions from a large floodplain lake in the lower Amazon. *Journal of Geophysical Research-Biogeosciences* 116, G04007, doi:10.1029/2011JG001699

- Sadro, S., J.M. Melack and S. MacIntyre. Spatial and temporal variability in ecosystem metabolism: free-water and incubation chamber measurements from benthic and pelagic habitats in a high-elevation lake (Emerald Lake, Sierra Nevada, California). *Ecosystems* : 10.1007/s10021-011-9471-5
- Sadro, S., C.R. Nelson and J.M. Melack. The influence of landscape position and catchment characteristics on aquatic biogeochemistry in high-elevation lake chains. *Ecosystems* doi 10.1007/s10021-011-9515-x
- 2012 Goodridge, B. and J.M Melack. Land use control of stream nitrate concentrations in mountainous coastal California watersheds. *Journal of Geophysical Research-Biogeosciences* 117, G02005, doi:10.1029/2011JG001833
- Sadro,S. and J.M. Melack. The effect of an extreme rain event on the biogeochemistry and ecosystem metabolism of an oligotrophic high-elevation lake (Emerald Lake, Sierra Nevada, California). *Alpine, Arctic and Antarctic Research* 44: 222-231
- Melack. J.M. Wetlands. *Encyclopedia of Remote Sensing*, in press
- Melack, J.M. and M.T. Coe. Climate change and the floodplain lakes of the Amazon basin In C.R. Goldman, M. Kumagai and R. Robarts (eds.) *Global Impact of Climate Change on Inland Water Systems*. John Wiley and Sons, in press
- Coombs, J.S. and J.M. Melack. The initial impacts of a wildfire on hydrology and suspended sediment and nutrient export in California chaparral watersheds. *Hydrological Processes*, in press
- Verkaik, I, M. Rieradevall, S.D. Cooper, J.M. Melack, T.L. Dudley and N. Prat. Fire as a disturbance in Mediterranean climate streams. *Hydrobiologia*, in press
- Cooper, S.D., P.S. Lake, S. Sabater, J.M. Melack and J.L. Sabo. The effects of land use changes on streams and rivers in Mediterranean climates. *Hydrobiologia*, in press

UCLA, 5714 Boelter Hall, Los Angeles, CA 90095-1593 (310) 825-1408, (310) 206-2222 (FAX) Email: stenstro@seas.ucla.edu,

Education

Ph.D., Environmental Systems Engineering, Clemson University, 1976

M.S., Environmental Systems Engineering, Clemson University, 1972

B.S., Electrical and Computer Engineering, Clemson University, 1971

Professional Background

Distinguished Professor, Professor, Associate Professor and Assistant Professor, Civil and Environmental Engineering Department, UCLA, 1977 to present

Research Engineer and Project Manager, Amoco Oil Company, Naperville, IL, 1975 to 1977.

Selected Awards / Affiliations

Board Certified Environmental Engineer, American Academy of Environmental Engineers.

Fellow (1997), Huber Prize (1989) American Society of Civil Engineers, Harrison Prescott Eddy Award (1992) Water Environment Federation, Dow Chemical Company Environmental Care Award (1995), Innovation in Research (2002, 2005), California Regional Water Quality Control Board, AEESP Fredrick Pohland Research Medal (2013)

Selected Project Experience (total grants and contract awards is more than \$12.5 million)

- NSF-ERC for the Control of Hazardous Substances, Hazardous Wastewater Treatment, Completed 1994
- DOE-LLNL, Mason & Hanger-Pantex-DOE, RDX-HMX treatment concepts, including regeneration of spent activated carbon, six projects extending from 1993 to 1997 California Dept of Transportation, Highway Stormwater Management, including toxicity and best management practices, six projects extending from 1999 to 2007, completed in 2007
- Southern California Edison-California Energy Commission, Development of methods for measuring and auditing energy consumption at wastewater treatment plants, started in 2004 and continuing to 2014.

Selected Publications (168 total journal publications)

1. Jiang, P, H-T Chen, R. W. Babcock and M.K. Stenstrom, "Modeling Ozone Mass Transfer in Reclaimed Wastewater," *Wat. Env. Research*, **81**(1), pp 57-68, 2009.
2. Ma, J-S, J-H Kang, M. Kayhanian and M.K. Stenstrom, "Sampling Issues in Urban Runoff Monitoring Programs: Composite versus Grab," *J. of Env. Engr. ASCE*, **135**(3), pp 118-127, 2009.
3. Park, M-H, and M. Stenstrom, and S. Pincetl "Water Quality Improvement Policies Lessons Learned from the Implementation of Proposition O in Los Angeles, CA," *Environmental Management*, **43**(3), pp 514-522, 2009.
4. Lau, S-L, Y. Han, J-H Kang, M. Kayhanian and M.K. Stenstrom, "Characteristics of Highway Stormwater Runoff in Los Angeles: Metals and PAHs." *Wat. Env. Research*, **81**(3), pp 308-318, 2009.

5. Singhirunnusorn, W. and M.K. Stenstrom, "Appropriate wastewater treatment systems for development countries: criteria and indicator assessment in Thailand," *Wat. Sci. & Tech.* **59**(9), pp 1873-1883, 2009.
6. Park, M-H, X. Swamikannu and M.K. Stenstrom, "Accuracy and Precision of the Volume-Concentration Method for Urban Stormwater Modeling," *Wat. Research*, **43**(11), pp 2773-2786, 2009.
7. Kang, J-H, S.R. Debats, and M.K. Stenstrom, "Stormwater Management Using Street Sweeping," *J. of Env. Engr. ASCE*, **135**(7), pp 479-489, 2009.
8. Leu, S-Y, R.W. Babcock Jr., C.J. Tzeng, and M.K. Stenstrom, "Modeling the Performance of Hazardous Wastes Removal in Bioaugmented Activated Sludge Processes," *Wat. Env. Research*, **81**(11), pp 2309-2319, 2009.
9. Leu, S-Y, D. Rosso, L.E. Larson and M.K. Stenstrom, "Real-Time Monitoring Aeration Efficiency in the Activated Sludge Process and Methods to Reduce Energy Consumption," *Wat. Env. Research*, **81**(12), pp 2471-2481, 2009.
10. Leu, S-Y and M.K. Stenstrom, "Bioaugmentation to Improve Nitrification in Wastewater Treatment," *Wat. Env. Research*, **82**(6), pp 524-535, 2010.
11. Leu, S-Y, J. A. Libra and M.K. Stenstrom, "Monitoring Off-gas O₂/CO₂ to Predict Nitrification Performance in Activated Sludge Processes," *Wat. Research*, **44**(11) pp 3434-3444, 2010.
12. Singhirunnusorn, W. and M.K. Stenstrom, "A Critical Analysis of Economic Factors for Diverse Wastewater Treatment Processes: Case Studies in Thailand," *Sustain. Environ. Res.*, **20**(4), pp 263-268, 2010.
13. Jiang, P., Tzeng, C-J, Hsieh, C.C., and M.K. Stenstrom, "Modeling VOC Emissions in the High Purity Oxygen Activated Sludge Process," *J. of Env. Engr. ASCE* **136**(11) pp 1189-1196, 2010.
14. Park, M-H, Ridgeway, I.K., Swamikannu, X., and M. K. Stenstrom, "Evaluation of Stormwater BMPs for Implementing Industrial Stormwater Permitting Strategy," *Wat. Sci. & Tech*, **62**(11), pp 2558-2563, 2010.
15. Curren, J., S. Bush, S. Ha, M.K. Stenstrom, S.L. Lau, and I. H. Suffet, "Identification of sub-watershed sources for chlorinated pesticides and polychlorinated biphenyls in the Ballona Creek watershed," *Sci. Total Env.*, **409**(13), pp 2525-2533, 2011.
16. Vasquez, V.R., J. Curren, S.-L. Lau, M.K. Stenstrom, and I.H. Suffet, "A Field Studies and Modeling Approach to Support Organochlorine Pesticide and PCB Total Maximum Daily Load Calculations: Case Study for Echo Park Lake, Los Angeles, CA," *Sci. Total Env.*, **409**(19), pp 4010-4015, 2011.
17. Chan, L.C., S.Y. Leu, D. Rosso, and M.K. Stenstrom, "The Relationship between Mixed-Liquor Particle Size and Solids Retention Time in the Activated Sludge Process," *Wat. Env. Research*, **83**(12), pp 2178-2186, 2011.
18. Leu, S.Y., L.C. Chan, and M.K. Stenstrom, "Toward Long SRT of Activated Sludge Processes: Benefits in Energy Saving, Effluent Quality, and Stability," *Wat. Env. Research*, **84**(1) 42-53, 2012.
19. Gil, K., Rho, H., Kim, D., and M.K. Stenstrom, "Comparison of Bio-P module and the Modified Bio-P Module in the Step-Feed Biological Nutrient Removal Process," *Env. Earth Sci.*, **65**(3) 929-936, 2012.
20. Jiang, P. and M.K. Stenstrom, "Oxygen Transfer Parameter Estimation: Impact of Methodology," *J. of Env. Engr. ASCE*, **138**(2) pp 137-142, 2012.
21. Rosso, D, L-M Jiang, D.M. Hayden, P. Pitt, C.S. Hocking, S. Murphy and M.K. Stenstrom, "Towards More Accurate Design and Specification of Aeration Systems Using On-site Column Testing," *Wat. Sci. & Tech*, **66**(3), pp 627-634, 2012.
22. Naik, K.S. and M.K. Stenstrom, "Evidence of the Influence of Wastewater Treatment on Improved Public Health," *Wat. Sci. & Tech*, **66**(3), 644-652, 2012.
23. Rosso, D., L-M Jiang, P. Pitt, C.S. Hocking, M.K. Stenstrom, S. Murthy, and D.M. Hayden, J. Zhong, D.H. Coller, A. Y. Kim and H. Xu. "Methodology for *In situ* Column Testing to Improve Accuracy during Design and Specification of Aeration Systems," *J. of Env. Engr, ASCE*, **139**(4), 530-537, 2013.

Student Advising

Major professor of 47 Civil and Environmental Engineering and 16 Environmental Science and Engineering students to the completion of their doctoral degrees. Subjects range from municipal and industrial water and wastewater treatment, stormwater management, and the impacts of various policy issues on environmental engineering.

State Water Resources Control Board

[Date]

[Example of a letter initiating review.]

[Name and
professional address
of reviewer]

Dear Professor/Doctor _____,

[SUBJECT] EXTERNAL PEER REVIEW OF _____

[Optional Introductory Paragraph]

My letter today is intended to initiate the next phase of the external review – the actual review itself.

Included in this letter are the following:

- a) The [date] request for external reviewers, including [#] attachments, signed by _____;
- b) January 2009 Supplement to the Cal/EPA Peer Review Guidelines;
- c) Key documents for review (if not included with request letter attachments);
- d) Key supporting documents, including all references in hard copy and/or on CD.

Comments on the foregoing:

1. You have been sent the request letter during the solicitation process for reviewer candidates conducted by the University of California.
2. Attachment 2 to the request letter provides focus for the review. I ask that you address all topics, as expertise allows, in the order listed.
3. The January 7, 2009 Supplement. In part, this provides guidance to ensure the review is kept confidential through its course. The Supplement notes reviewers are under no obligation to discuss their comments with third-parties after reviews have been submitted. We recommend they do not. All outside parties are provided opportunities to address a proposed regulatory action through a well-defined regulatory process. Direct third-parties to me.

Please return your review directly to me. Questions about the review, or review material,

Professor _____

- 2 -

[Date of Letter]

should be for clarification, in writing – email is fine, and addressed to me. My responses will also be in writing. The State Water Resources Control Board (Water Board) should not be contacted. All this information will be posted at the program website, and the State and Regional Water Board's Scientific Peer Review website.

I would appreciate your review being completed by _____ [30-day period recommended].

Your acceptance of this review assignment is most appreciated.

Sincerely,

[Signature and professional affiliation,
as well as contact information.]

**Supplement to Cal/EPA External Scientific Peer Review Guidelines –
“Exhibit F” in Cal/EPA Interagency Agreement with University of California
Gerald W. Bowes, Ph.D.**

Guidance to Staff:

1. Revisions. If you have revised any part of the initial request, please stamp “Revised” on each page where a change has been made, and the date of the change. Clearly describe the revision in the cover letter to reviewers, which transmits the material to be reviewed. The approved reviewers have seen your original request letter and attachments during the solicitation process, and must be made aware of changes.
2. Documents requiring review. All important scientific underpinnings of a proposed science-based rule must be submitted for external peer review. The underpinnings would include all publications (including conference proceedings), reports, and raw data upon which the proposal is based. If there is a question about the value of a particular document, or parts of a document, I should be contacted.
3. Documents not requiring review. The Cal/EPA External Peer Review Guidelines note that there are circumstances where external peer review of supporting scientific documents is not required. An example would be "A particular work product that has been peer reviewed with a known record by a recognized expert or expert body." I would treat this allowance with caution. If you have any doubt about the quality of such external review, or of the reviewers’ independence and objectivity, that work product – which could be a component of the proposal - should be provided to the reviewers.
4. Implementation review. Publications which have a solid peer review record, such as a US EPA Criteria document, do not always include an implementation strategy. The Cal/EPA Guidelines require that the implementation of the scientific components of a proposal, or other initiative, must be submitted for external review.
5. Identity of external reviewers. External reviewers should not be informed about the identity of other external reviewers. Our goal has always been to solicit truly independent comments from each reviewer. Allowing the reviewers to know the identity of others sets up the potential for discussions between them that could devalue the independence of the reviews.
6. Panel Formation. Formation of reviewer panels is not appropriate. Panels can take on the appearance of scientific advisory committees and the external reviewers identified through the Cal/EPA process are not to be used as scientific advisors.
7. Conference calls with reviewers. Conference calls with one or more reviewers can be interpreted as seeking collaborative scientific input instead of critical review. Conference calls with reviewers are not allowed.

Guidance to Reviewers from Staff:

1. Discussion of review.

Reviewers are not allowed to discuss the proposal with individuals who participated in development of the proposal. These individuals are listed in Attachment 3 of the review request.

Discussions between staff and reviewers are not permitted. Reviewers may request clarification of certain aspects of the review process or the documents sent to them.

Clarification questions and responses must be in writing. Clarification questions about reviewers' comments by staff and others affiliated with the organization requesting the review, and the responses to them, also must be in writing. These communications will become part of the administrative record.

The organization requesting independent review should be careful that organization-reviewer communications do not become collaboration, or are perceived by others to have become so. The reviewers are not technical advisors. As such, they would be considered participants in the development of the proposal, and would not be considered by the University of California as external reviewers for future revisions of this or related proposals. The statute requiring external review of science-based rules proposed by Cal/EPA organizations prohibits participants serving as peer reviewers.

2. Disclosure of reviewer Identity and release of review comments.

Confidentiality begins at the point a potential candidate is contacted by the University of California. Candidates who agree to complete the conflict of interest disclosure form should keep this matter confidential, and should not inform others about their possible role as reviewer.

Reviewer identity may be kept confidential until review comments are received by the organization that requested the review. After the comments are received, reviewer identity and comments must be made available to anyone requesting them.

Reviewers are under no obligation to disclose their identity to anyone enquiring. It is recommended reviewers keep their role confidential until after their reviews have been submitted.

3. Requests to reviewers by third parties to discuss comments.

After they have submitted their reviews, reviewers may be approached by third parties representing special interests, the press, or by colleagues. Reviewers are under no obligation to discuss their comments with them, and we recommend that they do not.

All outside parties are provided an opportunity to address a proposed regulatory action during the public comment period and at the Cal/EPA organization meeting

where the proposal is considered for adoption. Discussions outside these provided avenues for comment could seriously impede the orderly process for vetting the proposal under consideration.

4. Reviewer contact information.

The reviewer's name and professional affiliation should accompany each review. Home address and other personal contact information are considered confidential and should not be part of the comment submittal.