February 25, 2019

State Water Resources Control Board Members
Attn: Ms. Jeanine Townsend, Clerk
1001 “I” Street
Sacramento, CA  95814

via email to: commentletters@waterboards.ca.gov

Re:  Support for Resolution Authorizing Use of Supplemental Environmental Project (SEP) Funds for Delta Regional Monitoring Program Projects in the Central Valley Region

Dear Chair Esquivel and Board Members:

The Partnership for Sound Science in Environmental Policy (PSSEP) is an association of regulated parties in California whose members are permitted by the State and Regional Water Boards under their joint, Federal Clean Water Act and Porter-Cologne Water Quality Control Act authorities.

PSSEP strongly supports the proposed Resolution to Authorize Use of Supplemental Environmental Project (SEP) Funds for Delta Regional Monitoring Program Projects (the “Resolution”). Last year, PSSEP also supported a similar Resolution (adopted by the State Water Board) that would authorize use of SEP funds for RMP projects within the San Francisco Bay Region. We support the present Resolution for the Delta RMP for many of the same reasons as we did last year, but paramount among them is that our members believe strongly in the importance of broad-based monitoring in the Delta to inform the Regional and State Water Boards when making water quality-related policy decisions.

In a perfect world, perhaps, there would be unlimited state-provided funding for all necessary and desirable water quality monitoring in the Delta in order to coordinate and prioritize management decisions in the Delta and beyond. But because there are limitations on the availability of these funds, we believe that authorizing the Central Valley Regional Water Board to allow supplemental environmental project funding be directed to Delta RMP monitoring activities in appropriate instances will help augment budgetary shortfalls for important monitoring and special studies projects.
PSSEP is particularly interested in Delta RMP monitoring activities and special studies related to mercury in water and fish tissue, as well as nutrients and selenium. It is no secret that the water quality conditions of the Delta and San Francisco Bay are related in many respects, and to the extent the Delta RMP is able to improve water quality monitoring in the Delta, it would lead to a better, more coordinated understanding of water quality conditions in San Francisco Bay, as well.

Thank you for the opportunity to provide these comments in support of the State Board’s consideration of a Resolution to Authorize Use of Supplemental Environmental Project SEP Funds for Delta Regional Monitoring Program Projects.

Sincerely,

Craig S.J. Johns
Program Manager