From:	Jason Cruz
To:	Hagy, Jim (he/him/his)
Cc:	John.Yagecic@drbc.gov; Amidon, Thomas; Bransky, Jacob; Namsoo Suk; Kelly Anderson
Subject:	Sturgeon DO Criteria Discussion at DRBC Water Quality Advisory Committee Meeting 3/23/2023
Date:	Wednesday, March 22, 2023 10:15:07 AM
Attachments:	PWD_DRBC_AA_Comments_Transmittal_to_EPA_01_20_2023.pdf PWD_Preliminary_Review_Delaware_Hudson_Sturgeon_DO_Data_03_14_2023.pdf

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Good Morning Mr. Hagy,

PWD has learned that you will be addressing the Delaware River Basin Commission (DRBC) Water Quality Advisory Committee (WQAC) regarding DRBC and EPA interpretation of laboratory studies of the effects of hypoxia on juvenile Atlantic sturgeon. PWD has extensively reviewed the relevant literature on this subject and provided comments to DRBC regarding the use of laboratory and primary literature sources for deriving DO criteria protective of sturgeon. We have also conducted a preliminary review of an ongoing sturgeon sampling program conducted by DNREC as well as a sturgeon trawling and relocation program conducted 2014-2019.

Please see attached PWD's comment letter that was addressed to EPA Assistant Administrator Fox 1/19/2023 regarding EPA's proposed federal water quality standards for zones 3, 4 and upper zone 5 of the Delaware River. Pages 47-54 of the letter address PWD's objections to the use of the Niklitschek & Secor 2001 & 2009 publications for derivation of DO criteria.

PWD also recently presented a preliminary review (also attached) of the observed sturgeon monitoring information for the Delaware estuary. We recognize that there is a great deal of fisheries-specific knowledge and expertise within the state and federal agencies that will be essential when interpreting these data.

We look forward to the discussion at the WQAC meeting tomorrow, and in a greater sense, continuing to work with DRBC, EPA and the basin states to find solutions for rebuilding the Delaware sturgeon population that are based in sound science.

Thanks,

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