TO: Rick Woodard August 7, 1997
FROM: Leo Winternitz

SUBJECT: Comments on the Draft CMARP Document

Rick - At the last Water Quality Technical Group meeting you asked for comments on the CMARP document, among others. Please accept these comments in the constructive manner for which they are intended.

GENERAL COMMENTS:

The main message I get from the draft CMARP is that CALFED will appoint a staff member to be a monitoring, assessment and research czar ostensibly for the Bay-Delta estuary and tributary watersheds. Using other agencies/entities to implement the program elements, the czar/manager will direct and modify, as needed on an annual basis the monitoring, research and assessment program. The program will only focus on those elements that directly support the CALFED program. Based on this description, I expect that CALFED will be providing the necessary budgetary resources on a permanent basis to have the program conducted. Is this assumption wrong?

I guess I had a different conception on what CMARP was supposed to do. I thought that the CMARP program, instead of focusing on control, would focus on how best to develop a coordinated monitoring and research program that results in informative assessments taking into consideration the needs of CALFED as well as the needs and mandates of other State and federal agencies. I thought that CMARP was to be the tool to bring the various agencies and other entities that conduct monitoring and research in the estuary together to develop a comprehensive and coordinated program. I do not see how that will be done based on the draft description I read. I have some (but certainly not all) ideas and would be willing to discuss them with you.

SPECIFIC COMMENTS:

· First page, (under Principles) first paragraph -- Does this development of a robust management structure include the development of budgetary program to secure and distribute funds to conduct the work?

· First page, last bullet - It is stated that the emphasis on CMARP is not on data collection but on data evaluation and use. I would suggest that CMARP place equal emphasis on all three aspects. Poor data collection methods and techniques will result in mistaken data evaluation and erroneous use.

· Second page, first bullet - It is stated that "Only the assessments required in direct support of the CALFED program will be included within CMARP." I am not quite sure what this statement means or implies. CMARP will be directing other agencies to implement the program. These agencies may have additional mandates or missions that need to be taken into consideration. Thus the need not only for a comprehensive program, but also one that is coordinated and even integrated. If CALFED completely covers the additional budgetary considerations of these agencies to do specified CALFED work, then I suppose they can focus solely on only CALFED program needs. A specific example of another mandate/mission is D-1485 monitoring. DWR and the USBR under the auspices of the IEP currently conduct this work. Unless water right permits are modified, this work will have to continue in addition to meeting other CALFED needs.

· Second page, first bullet - It is possible that CMARP and similar assessment activities may not only have to be coordinated, but also collaborated upon, and where feasible and practical, integrated. This comment is related to the previous comment, above.

· Second page, first full paragraph under Organization - It is stated here that CALFED's program manager will have final decision making authority concerning the content of the program, program budget, fiscal control and will assure accountability of program participants. Some pretty strong authority is being asserted here. I assume that this authority will be backed up with adequate budgets and other incentives for agencies/entities to participate in and implement the program. If not, then how do you expect this management scheme to work?

· Second page, first paragraph under Annual Monitoring, Evaluation and Research Plan - It is stated here that each year the program manager will publish a plan for the monitoring, evaluation and research to be conducted the following year. Based on my experience, this is a lot of work. I would suggest that either three or five year plans be developed. These plans could be reviewed annually to ensure they still contain relevant program objectives.

· Last page, Implementation of the CMARP - It is stated here that CMARP will be implemented beginning with approval of 1997 Category III projects. How is the CMARP being implemented with relation to Category III? How does this implementation relate to CMARP as described in the draft document? Lastly, is it a little premature to start implementing CMARP based on a draft document that has not yet been thoroughly reviewed or commented on by various parties?

As I mentioned above, I am willing to discuss these comments with you.
Thank you for the opportunity to review and comment.

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