

Comments on 10/1/98 draft of DEFT Report

Executive summary-

The summary needs major revision. The basic problem is that it confuses our recent thinking about DEFT recommendations with the scenario which was evaluated. The scenario which was evaluated had a new set of fixed operational requirements and differed structurally from Alternative 1 only in that it included the 2,000 cfs Hood-Mokelumne channel. It did not include flexible operations and the recent thinking on CVP/SWP screens. The CVP/SWP screens were assumed to be full state-of-the-art screens included in Alternative 1. The scenario was evaluated only for comparison to other alternatives. It should be clear that DEFT does not recommend it.

The whole section needs substantial revision as a result.

Other specific comments on the Executive Summary are:

1. P.iii- #3 needs to be included to include fish generally.
2. P. 1 (?) 3d bullet- This is not a new provision and hence it should not be mentioned in this list.
3. P 1- Harvest Discussion- This should not be presented as in conflict with CALFED principles. Instead, it should be presented as harvest measures being presented as those necessary for sound fishery management. It only gets into conflict with CALFED principles when increased harvest regulation is substituted for correcting habitat degradation impacts.

Also, if harvest measures out of the report are to be listed either all should be listed or a general summary presented.

4. P. iv- last bullet- Was Madera Ranch actually included in operations studies?
5. P. v- Add the following additional sentence to the salmon summary: Much of the benefit would depend on upstream habitat improvement measures implemented after Stage 1.

REPORT STRUCTURE-

Chronologically, DEFT developed a scenario for evaluation based on a set of operations measures which earlier evaluations showed had some promise for improving conditions, and later we developed recommendations for CALFED to consider in defining the Preferred Alternative and Stage 1 actions. I thought we had agreed that the latter were to be presented in that context, rather than as if we used them to develop the "new scenario". We did not use them to develop that scenario, and if we had the scenario would likely have been different, so it is not just a semantic issue. Also describing the recommendations as being related to the Preferred Alternative would result in their having substantially greater chance of influencing the CALFED

product. In fact, our failure to get them reflected appropriately in this draft leads me to suggest that we ought to have 2 reports. One which simply describes what DEFT did re the “new scenario” evaluation, and the other to pass on recommendations re the Preferred Alternative and Stage 1 actions.

In summary of my concern, the report needs to be largely rewritten. Essentially everything on pages 4-8 and 12-17 is applicable to the recommendations DEFT developed concerning the preferred alternative and does not pertain directly to the scenario which was evaluated. It needs to go in a second section after the scenario evaluation is described or placed in a separate report.

SPECIFIC COMMENTS-

1. P. 2 pp4, sentence re 3 species- This qualification pertains to all DEFT work, including the June 25 report. It needs to be placed earlier so that is clear. More importantly, the sentence re full support of the scenario is misleading. No DEFT team members have recommended the alternative.
2. P. 3- most of Harvest Team needs asterisks.
3. P. 4 It is appropriate to include the minority viewpoint in the report, but it should not be done by giving those holding that viewpoint to present a one-sided discussion. Someone needs to do more editing in that regard than I am going to take time to attempt. The third paragraph on this page is an excellent example of this problem. It is a one sided description prepared by the minority, with no corresponding presentation of minority view. It even ends with a sentence that purports to state the majority position, but is actually a total fabrication and misleading statement which I am disappointed that some minority representative would even purport to believe. The majority is unwilling to accept the minority viewpoint because we believe it reflects some fundamentally flawed views of estuarine ecology, not because it is new.
4. P. 5 first sentence- What are “improved local velocity fields and residence time? They need to be specific. The reference to habitat conditions probably reflects another general shortcoming of the minority statements as it presumably refers to the types of habitat restoration included in the ERP, and thus part of point 5 on page 7 rather than part of an alternative hypothesis regarding net flows.
5. P. 5 b. I do not understand what the minority viewpoint is really saying. For example, what does “uncertain synergies and/or antagonisms , among other factors” really mean? The magnitude of Delta outflow is clearly a “specific factor” with the properties called for in the minority's last sentence, and relates to processes found in estuaries throughout the world.
6. P. 6, 2a The minority view is not really an alternative hypothesis. It is merely a restatement of the majority view. Hence no minority view is needed.
7. P. 6, 2b The majority statement that survival is “much reduced” to describe survivals on the order of 1/3 to 1/2 hardly seems to be “greatly overstated” as the minority contends.

8. P. 6, 3a The minority hypothesis describes one way of dealing with the majority hypothesis, rather than being an alternative.

9. P. 7 3b We should not accept a minority viewpoint that reducing harvest is an legitimate alternative hypothesis for reducing entrainment losses. Their first sentence is their legitimate alternative viewpoint.

10. P. 7 4a This is another example where the minority viewpoint is merely a restatement in somewhat more detail of the majority hypothesis. There is no need for majority and minority viewpoints.

11. P. 7 and 8, 5a,b,c- 5b is really part of 5 a and c and 5c needs to be broadened to clearly include the Sacramento River, which is the most important corridor.

12. P. 8 Approach- Saying "Deft developed various concepts for review" is unnecessarily vague. In reality DEFT developed a set of operations criteria and one structural change which were evaluated.

The result of the habitat team product was considered by the species teams during their evaluation.

13. P. 9 Export losses-considerations included screen both at Hood and the south Delta and included the whole range of parameters affecting survival in the screening process, not just export rates. ie, points 3 and 4 are part of this.

14. P. 9 Fish food Supply- This explicitly included consideration of the effects of habitat restoration on food supply.

15. P. 10 Flow below Hood is too limiting. Description needs to recognize that the issue is a function both of inflow and amount diverted into the Central Delta.

16. P. 11 Salmon pp1 should simply say "recovery of salmon" at end of paragraph. References to endangered species are inaccurate and misleading.

17. P. 11 The harvest team did not deal with striped bass.

18. P. 12 Obviously the scenario description needs major revision consistent with initial comments on structure of the report.

19. P. 13 iv. At top of page- this action only minimizes water quality impacts- not "without compromising"

20. P. 13- Old River barrier- I do not believe the barrier improves water quality below it. Please check.

21. P. 13 3 and 4- These need to be rewritten to make it clear that the decision is yet to be made as to whether the capability to divert at the higher rates through the new screens will be provided. Also for the SWP. The introductory description needs to be rewritten to be consistent with the second bullet.

22. P. 17 The structures and the other parts of this table have now been corrected to be a correct representation of the scenario evaluated by DEFT. In the final report, make sure that it does not get into the Stage 1 actions as the fish screen and operations would be incorrect for that section.
3.

I have run out of time and am not going to be able to comment on pages 19 and beyond to meet your deadline.