

Comments on DEFT (10/1/98) Report Birk (10/5/98)

The Executive Overview fails to synthesize species matrices and as a result a management tool to prioritize actions for best potential of recovery of multi species and lifestages is not available . This apparent oversight suggests that the DEFT product is driven by single species priorities and not multi species management proposed by CALFED.

Executive Overview

Harvest actions

Page 1

These regulatory actions would be inconsistent with the CALFED solution principal of “ no significant redirected impacts “ . It should be noted that considerable redirected impacts are apparent to water users resulting from implementation of Stage 1 activities . Please state in this section “ that recovery is unlikely if reduction measures in harvest are not implemented “ . Harvest actions only stipulate evaluations. Stage 1 activities should include adaptive management of commercial and sport take .

Introduction

Page 2 paragraph 2 , this language is not consistent with similar language in the Executive Overview page ii paragraph 2 and should be stated the same and the word recommend should be replaced with develop an improved alternative.

Page 4 paragraph 4

It should be noted that although minority hypotheses are presented if related to a goal to give perspective, however , species teams only scored actions as a function of the majority hypothesis and respective scientific underpinnings. Had the species team attempted to score benefits and impacts using minority hypotheses, scores could have been considerably different. As a result, an array of evaluation was not attempted . Considering the uncertainty associated with both minority and majority hypotheses , not scoring alternatives is recognized by DEFT as major omission .

Page 7

Improve Delta Habitat

Reference to developing improved through the south delta is debatable. Whether or not fish movement towards the pumping plants is slowed may not be relevant , if predator habitat predation is increased as a result of this action . However, habitat in the central and northern delta may have greater potential to isolate at risk fish from the pumps.

Page 8

6 .Improve Water Quality

Improve water temperatures.

DEFT should make every attempt to determine if this feasible .

Page 8

Add a bullet

c. Employ adaptive management based on reduction of exploitation of the ocean fishery.

Page 9

Delta flow parameters

Paragraph 1

A statement should be included that species teams only considered majority hypotheses while rating impact parameters and scores may have varied differently had minority hypothesis been considered.

Page 16 bullet

Impacts (such as water temperature) may shift to other species or life stages. Please provide an example here .

Page 17

Harvest actions

Paragraph 1

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Include bullet

19. Employ adaptive management based on reduction of exploitation of the ocean fishery.

Page 20

Lower Sacramento River Flow below Hood

Does the passage of 2000 cfs flows into the central delta have any benefits?