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I'm headed back to my office but thought I'd give you a few thoughts on what I think are the critical missing pieces in the draft. I hope this is helpful. Look forward to the next draft.

Elise

Context: This commitment to developing an EWA came out of a longer much broader process. The team engaged in 1) a biological evaluation of entrainment effects relative to the three alternatives 2) a biological evaluation of entrainment effects relative to a through Delta approach 3) development of a range of scenarios ranging from a "prescriptive" approach to a "flexible operations" approach and finally to a "salvage based" approach. The CALFED document must recognize this context and evolution otherwise the EWA will be seen as the tool to solving a broader range problems.

Also, the draft must reflect the range of approaches that are possible in Phase I - particularly a "hybrid" approach which we all spent considerable amount of time working towards.. For example, additional protective standards could be written into the operating rules for Phase I that would be accomplished every year (i.e., extending VAMP export restriction) and then using an EWA to apply flexibly during other times of the year to reduce entrainment effects.

For example:

"There is a range of approaches to addressing the conflict between water supply reliability and fish protection in the Delta. The DEFT and the DNCT developed such a range which included a standards based approach, the use of standards and flexible operations, as well as a salvage based approach. The technical teams determined that the goals of wsr and fish recovery could be achieved under any of the scenarios, however, the time frame would be the critical difference.

Scope: The EWA is a potential tool for solving entrainment effects of project operations in the Delta on species of concern. The EWA is not a potential tool for solving the system's water quality problems or other ecosystem problems. This should be stated up front.

Relationship to Recovery: The document currently does not make clear that use of an EWA is a tool to reduce entrainment effects of project operations. Implementation is clearly an accounting exercise. We will NOT be able to measure progress on the trajectory towards recovery of species of concern by engaging in this accounting exercise. Further, the EWA will be a limited tool - this is an important point. We had no means for evaluating potential biological benefits or impacts of our exercise in attempting to see how the EWA might work for fish. This must be explained up front.

For example:

"The EWA could be used to implement flexible operations during periods of biological risk and impact. However, it was not possible to evaluate whether or how biological benefits would have been achieved as a result of implementing the EWA. In contrast, however, it was possible to perform an accounting exercise to determine the quantity of water committed to EWA actions. There must be a clear and significant linkage between the implementation of an EWA and implementation of the CMARP. Furthermore, it must be recognized that though CALFED anticipates learning a great deal about the system as a result of the CMARP questions related to the effects of project operations on the recovery of fish populations may not be answered in the first Phase."